

# **EXHIBIT L**

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

THE WIMBLETON FUND, SPC (CLASS )  
TT), )  
 )  
PLAINTIFFS, )  
 )  
VS. ) CASE NO.  
 ) 2:15-CV-6633-CAS-ASJWx  
 )  
GRAYBOX LLC; INTEGRATED )  
ADMINISTRATION; EUGENE SCHER, AS )  
TRUSTEE OF BERGSTEIN TRUST; AND )  
CASCADE TECHNOLOGIES CORP, )  
 )  
DEFENDANTS. )  
 )

---

VIDEOTAPED DEPOSITION OF KIARASH JAM, 30 (B) (6)

TAKEN ON

THURSDAY, MARCH 28, 2019

Sandra Mitchell  
C.S.R. 12553

Page 2

1 UNITED STATES DISTRICT COURT  
 2 CENTRAL DISTRICT OF CALIFORNIA  
 3  
 4 THE WIMBLEDON FUND, SPC (CLASS TT), )  
 5 )  
 6 PLAINTIFFS, )  
 7 VS. ) CASE NO.  
 8 ) 2:15-CV-6633-CAS-ASJWx  
 9 )  
 10 GRAYBOX LLC; INTEGRATED )  
 11 ADMINISTRATION; EUGENE SCHER, AS )  
 12 TRUSTEE OF BERGSTEIN TRUST; AND )  
 13 CASCADE TECHNOLOGIES CORP., )  
 14 )  
 15 DEFENDANTS. )  
 16 \_\_\_\_\_)

17 VIDEOTAPED DEPOSITION OF KIARASH JAM, 30(B)(6) taken on  
 18 behalf of the Plaintiff, at 10100 Santa Monica Boulevard,  
 19 13th Floor, Los Angeles, California, commencing at  
 20 9:57 a.m., Thursday, March 28, 2019, before Sandra Mitchell,  
 21 C.S.R. 12553, pursuant to Notice.

Page 3

1 APPEARANCES:  
 2 For the Plaintiffs, THE WIMBLEDON FUND, SPC (CLASS TT):  
 3 COLE SCHOTZ  
 4 BY: JAMES W. WALKER, ESQ.  
 5 901 MAIN STREET, SUITE 4120  
 6 DALLAS, TEXAS 75202  
 7 (469) 557-9391  
 8 E-MAIL: JWALKER@COLESCHOTZ.COM  
 9  
 10 For the Plaintiffs, THE WIMBLEDON FUND, SPC (CLASS TT):  
 11 COLE SCHOTZ  
 12 BY: ERIC S. LATZER, ESQ.  
 13 COURT PLAZA NORTH  
 14 25 MAIN STREET  
 15 HACKENSACK, NEW JERSEY 07601  
 16 E-MAIL: ELATZER@COLESCHOTZ.COM  
 17  
 18 For the Defendants, KIARASH JAM:  
 19 LAW OFFICE OF DAVID WIECHERT  
 20 BY: WILLIAM J. MIGLER, ESQ.  
 21 27136 PASEO ESPADA, SUITE B1123, ESQ.  
 22 SAN JUAN CAPISTRANO, CALIFORNIA 92675  
 23 (949) 361-2822  
 24 E-MAIL: WILLIAM@DAVIDWIECHERT.COM  
 25  
 26 Also Present:  
 27 BRANDON CAHOLA, VIDEOGRAPHER

Page 2

Page 4

1 I-N-D-E-X  
 2 WITNESS  
 3 KIARASH JAM  
 4 PAGE  
 5 EXAMINATION BY MR. LATZER 8  
 6  
 7 E X H I B I T S  
 8 NUMBER DESCRIPTION PAGE  
 9 EXHIBIT 1 - Notice of Rule 30(B)(6), deposition 8  
 10 of defendant Integrated Administration.  
 11 EXHIBIT 2 - Corporate Documents for Integrated Administration 10  
 12 EXHIBIT 3 - List of Wire Transfers 37  
 13 EXHIBIT 4 - E-mail - November 17, 2011 44  
 14 EXHIBIT 5 - E-mail - November 23rd, 2011 48  
 15 EXHIBIT 6 - E-mail - November 29, 2011 66  
 16 EXHIBIT 7 - E-mail - February 22nd, 2012 71  
 17 EXHIBIT 8 - E-mail - March 6, 2012 75  
 18 EXHIBIT 9 - E-mail - March 13, 2012 79  
 19 EXHIBIT 10 - E-mails - April 13, 2012, April 14, 2012 83  
 20 EXHIBIT 11 - E-mail - May 30th, 2012 87  
 21 EXHIBIT 12 - E-mail - July 2nd, 2012 89  
 22  
 23  
 24  
 25

Page 3

Page 5

1 IN D E X (Continued)  
 2 E X H I B I T S  
 3  
 4 NUMBER DESCRIPTION PAGE  
 5 EXHIBIT 13 - Chart of Money Transfers 96  
 6 EXHIBIT 14 - Chart of Money Transfers 111  
 7 EXHIBIT 15 - Chart of Money Transfers 118  
 8 EXHIBIT 16 - Chart of Money Transfers 126  
 9 EXHIBIT 17 - Chart of Money Transfers 131  
 10 EXHIBIT 18 - Select TT Recipient Entities 137  
 11 EXHIBIT 19 - PERIODIC PAYMENTS TO KIARASH, K.JAM 138  
 12 EXHIBIT 20 - Integrated Administration Invoices 152  
 13 to Sovrin  
 14 EXHIBIT 21 - Payroll Summary 172  
 15 EXHIBIT 22 - Barnes Law Firm Letter - 2/7/2012 197  
 16 QUESTIONS INSTRUCTED NOT TO ANSWER  
 17 (NONE)  
 18 INFORMATION REQUESTED  
 19 (NONE)  
 20  
 21  
 22  
 23  
 24  
 25

2 (Pages 2 to 5)

Page 6				Page 8			
00:00:01	1	LOS ANGELES, CALIFORNIA, THURSDAY, MARCH 28, 2019		10:01:27	1	A That is correct.	
	2	AT 9:57 A.M.			2	Q Okay. I've placed in front of you what I've	
	3				3	marked as Exhibit 1.	
	4	THE VIDEOGRAPHER: Good morning. We are on the			4	(Exhibit 1 was marked for	
09:59:32	5	record. My name is Brandon Cahela. I'm a notary		10:01:34	5	identification by the Court Reporter	
	6	public, contracted by eLitigation Services.			6	and is attached hereto.)	
	7	I am not financially interested in this action,			7	BY MR. LATZER:	
	8	nor am I a relative or employee of any of the attorneys			8	Q And Exhibit 1 is the Notice of Rule 30(B)(6),	
	9	or any of the parties.			9	deposition of defendant Integrated Administration.	
09:59:45	10	Today is March 28, 2019, and the time is		10:01:48	10	Have you seen this document before?	
	11	approximately 9:57 a.m. This video deposition being			11	A I don't know. I don't think so.	
	12	taken at 10100 Santa Monica Boulevard on the 13th floor,			12	Q Okay. I'm going to ask you to turn to page 2.	
	13	Los Angeles, California 90067.			13	A Yes, sir.	
	14	The name of the case is the Wimbledon Fund			14	Q And just to be clear, it's the one that's	
10:00:11	15	versus Graybox LLC, filed in the United States District		10:02:06	15	No. 2. It's actually page 3 of the document.	
	16	Court, Central District of California, Western Division.			16	A Oh.	
	17	The Case No. is CV-6633-CAS-AJWx. This is			17	Q I think you're on the right page. It says	
	18	Volume 2 in the videotaped deposition of Mr. Kia Jam,			18	"Topics" at the bottom.	
	19	and this deposition today is being taken by attorney			19	A Yes, but it says "2" on the bottom.	
10:00:39	20	Eric S. Latzer.		10:02:15	20	Q Right. That's the one I want you to look at --	
	21	Would the attorneys introduce themselves and			21	A Okay. Okay.	
	22	state who you represent.			22	Q So the instructions are unclear.	
	23	MR. LATZER: Eric Latzer for the Plaintiff.			23	A Okay. Thank you.	
	24	MR. WALKER: Jim Walker for plaintiff.			24	Q So beginning on the bottom of that page where	
10:00:52	25	MR. MIGLER: William Migler for defendant.		10:02:20	25	it says, "Topics," and then continuing on to the next	
Page 7				Page 9			
10:00:54	1	THE VIDEOGRAPHER: Thank you. We are ready to		10:02:23	1	page, there are 14 listed topics.	
	2	proceed. The court reporter today is Sandi Mitchell			2	Do you see that?	
	3	with eLitigation Services. Would the reporter please			3	A Yes, I do.	
	4	swear in the witness so we can begin.			4	Q Okay. Have you seen this list of topics	
10:01:01	5	THE REPORTER: Please raise your right hand.		10:02:34	5	before?	
	6	Do you solemnly swear in the cause			6	A I don't know.	
	7	now pending to tell the truth, the			7	Q Okay. Why don't you take a minute to look at	
	8	whole truth, and nothing but the			8	those 14 topics.	
	9	truth, so help you God?			9	A Okay. Okay.	
10:01:09	10	THE WITNESS: Yes, I do.		10:03:21	10	Q Okay. You had a chance to review those topics?	
	11	THE REPORTER: Thank you very much.			11	A Yes.	
	12	KIARASH JAM,			12	Q And my question is, are you prepared to discuss	
	13	having been duly sworn,			13	these topics with me today?	
	14	was examined and testified as follows:			14	A I'll answer any questions you ask me.	
10:01:09	15	EXAMINATION		10:03:31	15	Q Okay. Let's talk about Integrated	
	16	BY MR. LATZER:			16	Administration. You testified yesterday that it was a	
	17	Q Good morning, Mr. Jam.			17	company that, as you said, was set up to pay people and	
	18	A Good morning to you, sir.			18	payroll; is that correct?	
10:01:15	19	Q You were deposed yesterday in your individual			19	A That's part what I did, yes.	
	20	capacity; is that correct?		10:03:42	20	Q Okay. And I believe you also testified that	
	21	A Yes, sir.			21	Integrated Administration only provided services for	
	22	Q And you understand that today you're being			22	companies and individuals with which you or	
	23	deposed in your capacity as a corporate representative			23	Mr. Bergstein was affiliated; is that correct?	
	24	for the defendant Integrated Administration?			24	A That's my recollection. Yes.	
10:01:24	25			10:03:55	25	Q Okay.	

Page 10				Page 12			
10:03:56	1	A	Is this done?	10:06:13	1	Q	Okay. And your name is listed there?
2		Q	Yeah. You can set it to the side like you did	2		A	Yes, sir.
3			yesterday.	3		Q	So you were appointing yourself as the chief
4			I'm going to show you what's been marked as	4			executive officer of Integrated Administration?
10:04:04	5		Exhibit 2.	10:06:21	5	A	That's correct.
6			(Exhibit 2 was marked for	6		Q	And No. 6 says "Secretary"?
7			identification by the Court Reporter	7		A	That is correct.
8			and is attached hereto.)	8		Q	And you were appointing yourself as the
9			BY MR. LATZER:	9			secretary of the Integrated Administration?
10:04:10	10	Q	And if you can let me know when you've had a	10:06:29	10	A	That's correct.
11			minute to look through that document.	11		Q	And No. 7 states "Chief Financial Officer."
12		A	Okay.	12			And you appointed yourself as the chief financial
13		Q	Are you able to describe for me, generally,	13			officer of Integrated Administration?
14			what this exhibit consists of?	14		A	That's correct.
10:04:38	15	A	The corporate documents for Integrated	10:06:39	15	Q	And just continuing down, No. 8 is under the
16			Administration. The California company.	16			section that states, "Names and complete address of all
17		Q	Okay. Now what prompted you to establish	17			directors including directors who are also officers."
18			Integrated Administration?	18			Did I read that correctly?
19		A	Uh, David and -- and I were going to be	19		A	Yes, you did, sir.
10:04:55	20		co-officing together. He asked that I set up a company	10:06:56	20	Q	Okay. And next to No. 8, it says your name.
21			that would handle payroll and overhead services, and	21			Do you see that?
22			that he would fund it, and I did.	22		A	Yes, sir.
23		Q	Okay. So the first page of this exhibit is --	23		Q	Okay. So you were appointing yourself a
24			at the top you see a Statement of Information.	24			director of Integrated Administration?
10:05:14	25		Do you see that?	10:07:03	25	A	Yes, sir.
Page 11				Page 13			
10:05:14	1	A	Yes, I do.	10:07:03	1	Q	And you were the only director of the company?
2		Q	Okay. And on the bottom right of the page, is	2		A	Yes, sir.
3			that your signature?	3		Q	Did that change at any time?
4		A	Yes, it is.	4		A	No, sir.
10:05:23	5	Q	Okay. And did you sign this document on or	10:07:09	5	Q	Okay. And throughout it's -- well, strike
6			about August 16, 2011?	6			that.
7		A	I -- I signed it. I don't remember when I	7			Was there any point in time where you weren't
8			signed it. It makes sense that it would been on -- on	8			the chief executive officer of the company?
9			or around that day.	9		A	No, sir.
10:05:36	10	Q	Okay. And what did you understand this	10:07:20	10	Q	And was there any point in time where you
11			document to do?	11			weren't the secretary of the company?
12		A	As part of the corporate formation documents	12		A	No, sir.
13			that needed to be filled out to start a company.	13		Q	And was there any point in time where you
14		Q	Okay. And did you have any assistance in	14			weren't the chief financial officer the company?
10:05:48	15		establishing Integrated Administration?	10:07:32	15	A	No, sir.
16		A	I don't remember. Maybe I used one of those	16		Q	Let's turn to the second page of the exhibit,
17			companies that set up companies for you. I don't	17			and I'm going to refer you --
18			remember.	18		A	Seventy-eight, I think?
19		Q	Okay. Do you recall whether you had a lawyer	19		Q	Yes. Like Mr. Walker did yesterday, I will, at
20			assist you in the process?	20			times, refer you to the Bates numbers in the bottom
21		A	I don't recall, actually.	21			right-hand corner of the documents.
22		Q	Okay. Now you see to the left on the first	22		A	No, problem.
23			page here, No. 5 says "Chief Executive Officer."	23		Q	So am I correct that this is another Statement
24			Do you see that?	24			of Information?
10:06:12	25	A	Yes, I do.	10:08:02	25	A	Um, yes, it is.

Page 14				Page 16			
10:08:05	1	Q Okay. The date on the top right says August		10:09:53	1	A Yeah. He was initially done, and then I think	
	2	25th, 2017.			2	a couple of weeks later he was removed.	
	3	Do you see that?			3	Q Okay. And do you know who the agent of service	
	4	A Yes, sir.			4	of process became when he was removed?	
10:08:14	5	Q Now, on the bottom right there's a place for		10:10:02	5	A Either myself or Majid, probably.	
	6	your signature.			6	Q Okay.	
	7	Do you see that?			7	A I don't know exactly, but either myself of	
	8	A Uh-huh. Yes, I do.			8	Majid.	
	9	Q And this does not appear to have been signed;		10:10:15	10	Q Okay. Now, if I can direct you to the page at	
10:08:23	10	is that correct?			11	the Exhibit Bates No. 7?	
	11	A That is correct.			12	A Okay.	
	12	Q Do you know whether you -- there ever came a			13	Q Now, do you agree with me that the pages Bates	
	13	point in time when you signed this document?			14	No. 7 through 13 consists of the bylaws for Integrated	
	14	A I don't have any recollection of this.		10:10:38	15	Administration?	
10:08:30	15	Q Okay. Did you draft this document?			16	A Yes.	
	16	A Um, no. I don't think so.			17	Q Do you know if these bylaws were issued at the	
	17	Q Do you know if someone did on your behalf?			18	time the company was formed, in or around August 201?	
	18	A I don't know anything about this document.			19	A I don't know.	
	19	Q You haven't seen this before?			20	Q Okay. If I can refer you to the next page, 14,	
10:08:45	20	A I don't think so.		10:11:03	21	and this is the Certificate of Secretary of Integrated	
	21	Q Okay.			22	Administration.	
	22	A If I have, I don't recall.			23	Do you see that?	
	23	Q Okay. Was it your understanding that a			24	A Yes, I do.	
	24	Statement of Information needed to be filed in 2017?			25	Q Okay. And that's your signature there?	
10:08:55	25	A I -- I think I get something in the mail that		10:11:11	25	A Yes, sir.	
Page 15				Page 17			
10:08:58	1	says, you know, you have to file this. I don't know if		10:11:11	1	Q Okay. And was this, as you understood, another	
	2	this is something that came in the mail. I don't know.			2	document that was necessary to establish the company?	
	3	There's a service that sends them out, and I don't know.			3	A Yes, sir.	
	4	Q Okay. And if you can turn to page 3, it's the			4	Q Okay. And the next page, 15.	
10:09:08	5	document that's Bates numbered 28.		10:11:20	5	A I don't know if this was necessary to establish	
	6	A Yes, sir.			6	the company, but this is part of the corporate	
	7	Q Do you see that? And this page consists of the			7	documents. I don't know specifically what the	
	8	Articles of Incorporation for Integrated Administration;			8	requirements to establish a company are.	
	9	is that correct?			9	Q Okay. Okay. And the next page, 15?	
10:09:20	10	A That is correct.		10:11:31	10	A Okay.	
	11	Q Okay. So this was another document you filed			11	Q This page is entitled, "The resolutions adopted	
	12	for the purposes forming the company?			12	by the incorporator of Integrated Administration."	
	13	A That is correct.			13	A Okay.	
	14	Q Now, if I could direct you to No. 3, it states,			14	Q And if I can direct you to the -- toward the	
10:09:30	15	"The name and address and the state of the corporation's		10:11:42	15	bottom right, there's an individual identified as Arial	
	16	initial agent for service of process is," and then			16	C. Ayaay --	
	17	there's an individual listed there. It's -- I'm not			17	A Uh-huh.	
	18	sure if I'm pronouncing this correctly, but Homoyan			18	Q -- incorporator.	
	19	Forman (sic)?			19	Do you see that?	
10:09:42	20	A Houmymoon Poormand, yes.		10:11:52	20	A Yes, I do.	
	21	Q Okay. Now, who is that individual?			21	Q Who is that?	
	22	A He's my uncle.			22	A Probably the service that was used to set up	
	23	Q He's your uncle. Okay. So you were designated			23	the company. I don't know who that person is, but	
	24	him -- designating him as the agent for service of			24	that's what would I guess based on this document.	
10:09:52	25	process for Integrated Administration?		10:12:00	25	Q Okay. And this document isn't signed?	

				Page 18					Page 20
10:12:03	1	A	This document is not signed.		10:14:20	1	the notice of annual meeting minutes. That was part of		
	2	Q	Okay. If you turn to page 19?			2	23; is that correct?		
	3	A	Yes, sir. Page 19 or stamp 19?			3	A Yes.		
	4	Q	Stamp 19?			4	Q Okay. And on page 24 --		
10:12:18	5	A	Okay. Great. Yes, sir.		10:14:34	5	A Yes.		
	6	Q	Now this document identifies K.Jam Media, Inc.			6	Q -- the document's entitled "Minutes of Annual		
	7		as owning 100 shares of Integrated Administration; is			7	Meeting of Board of Directors of Integrated		
	8		that correct?			8	Administration."		
	9	A	Yes, it does.			9	Do you see that?		
10:12:33	10	Q	Now, is it your understanding K.Jam Media, Inc.		10:14:41	10	A Yes, I do.		
	11		owned all of the shares of Integrated Administration?			11	Q And that's your signature on that page?		
	12	A	Yes, sir.			12	A Yes, it is.		
	13	Q	Okay. And K.Jam Media, Inc. is another one of			13	Q Okay. Now yesterday you reviewed with		
	14		your companies?			14	Mr. Walker various corporate documents for K.Jam Media.		
10:12:43	15	A	Yes, sir.		10:14:57	15	Do you recall that?		
	16	Q	Okay. And you're the -- are the sole owner of			16	A Yes, I do.		
	17	K.Jam Media, Inc.?				17	Q Okay. So now we've seen corporate formation		
	18	A	Yes, sir.			18	documents for another one of your companies, Integrated		
	19	Q	You own all the shares of that company?			19	Administration; is that correct?		
10:12:52	20	A	Yes, sir.		10:15:06	20	A Yes, you have.		
	21	Q	Okay. And if I could direct you to the page			21	Q Okay. So as with K.Jam Media, at the time you		
	22	Bates No. 21?				22	established Integrated Administration, you were familiar		
	23	A	Yes, sir.			23	with the fact that companies had officers --		
	24	Q	The name of this document is "Minutes of first			24	A Yes.		
10:13:22	25		meeting of stockholders of Integrated Administration.		10:15:17	25	Q -- is that correct? Okay.		
				Page 19					Page 21
10:13:24	1	A	Do you see that?		10:15:17	1	And you were familiar with and had personal		
	2	A	Yes, I do.			2	experience with signing legal documents in connection		
	3	Q	Okay. And was it your understanding that			3	with companies?		
	4		Integrated Administration -- well, strike that.			4	A A few. If these are legal documents, yes.		
10:13:37	5	Is it your signature on page 22 of this			10:15:27	5	Q Okay. Did you understand them to be legal		
	6	document?				6	documents when you signed them?		
	7	A	Yes, it is, sir.			7	A I just knew them to be, you know, requirements		
	8	Q	Okay. And following that, on page 23, you'll			8	to start a company.		
	9		see a document that's entitled "Waiver of Notice of			9	Q Okay. And you were familiar with designated		
10:13:51	10	Annual Meeting of Board of Directors of Integrated			10:15:35	10	agents for service of process for companies?		
	11	Administration"?				11	A Yes.		
	12	A	Yes, sir.			12	Q Okay. And you had personal experience with all		
	13	Q	Do you see that?			13	of these things?		
	14	A	Yes, I do.			14	A Yes. I know what a designated agent is.		
10:13:55	15	Q	And that's your signature on that page?		10:15:46	15	Q Okay. Now is Integrated Administration still		
	16	A	Yes, sir.			16	in existence?		
	17	Q	Okay. What was your understanding regarding			17	A No. I shut it down awhile ago, a year ago,		
	18		annual meeting -- meeting minutes for Integrated			18	something like that. I don't remember when.		
	19	Administration?				19	Q Okay. What prompted you to shut it down.		
10:14:04	20	A	Uh, that it's just a corporate formality.		10:16:00	20	A It was inactive for years and then I finally		
	21	Q	Okay. And you needed to account for that every			21	shut it down.		
	22	year?				22	Q Okay. When was the last time it was active?		
	23	A	I believe so. I don't know specifically, but I			23	A I don't remember specifically when I shut it		
	24		believe so.			24	down, but it was probably a year and a half ago, a year		
10:14:15	25	Q	Okay. So we see for 2011 there was a waiver of		10:16:12	25	ago, something like that. Maybe two years ago.		

Page 22				Page 24			
10:16:14	1	Q	That's when it stopped doing business?	10:18:07	1	the time that, as you testified to yesterday, things	
	2	A	No, that's when I shut it down.		2	went south with Mr. Bergstein?	
	3	Q	Okay. When did it -- when did it stop doing		3	A Yeah. That's when the businesses that --	
	4		business?		4	that's when, you know, um, it just -- we -- we -- the --	
10:16:19	5	A	It stopped doing business when kind of the work	10:18:17	5	the nature of the business changed. David and I weren't	
	6		that it was doing for Sovrin and the other entities came		6	working together anymore, the employees at Sovrin were	
	7		to end.		7	no longer employees, and I think I had gone off on my	
	8	Q	Okay. And approximately when was that?		8	own at that point, so the operation was just me and my,	
	9	A	I don't remember years. A couple years ago,		9	um, my assistant and -- and whatnot.	
10:16:33	10		five, six years ago, seven years ago. I don't know	10:18:37	10	Q Okay. What do you mean by "the nature of	
	11		exactly.		11	business changed"?	
	12	Q	Okay. Would you say 2012?		12	A Well, Sovrin stopped working, and so there was	
	13	A	I don't know when. Somewhere --		13	no need for this company anymore because those employees	
	14	Q	Okay.		14	were no longer employees, so I stopped using it. Those	
10:16:41	15	A	-- in that neighborhood.	10:18:51	15	guys were no longer employees.	
	16	Q	Between 2012, 2013? Does that sound right?		16	Q Okay. And is -- is it your testimony that the	
	17	A	As I said, I don't know. Somewhere in that		17	only business that Integrated Administration was doing	
	18		neighborhood.		18	was with Sovrin?	
	19	Q	Okay.		19	A No, that's not what I said. I just used that	
10:16:46	20	A	I don't know off the top of my head.	10:19:03	20	as an example.	
	21	Q	Now if you could turn the last page of what's		21	Q Okay. So were other entities that -- with	
	22		been marked as Exhibit 2.		22	which or --	
	23		Are you able to tell me what this is?		23	A There were other people that were on the --	
	24	A	Certificate of Dissolution.		24	Q Let me just finish.	
10:17:04	25	Q	Okay. And what do you understand that to be?	10:19:09	25	A Oh, I'm sorry.	
Page 23				Page 25			
10:17:05	1	A	This is how I shut the company down.	10:19:09	1	Q Were there other entities with which Integrated	
	2	Q	Okay. So I'm correct that there was a time		2	Administration stopped doing business around that time?	
	3		period of several years during which the company was not		3	A There was employees that were working on many	
	4		conducting business, but it was still an operating		4	other projects, and they ceased to become employees at	
10:17:19	5	A	entity?	10:19:20	5	that time, so --	
	6		Yes. Well, operating entity meaning I just		6	Q And this was -- this was all around the time	
	7		paid the \$800 a year.		7	that things went south with Mr. Bergstein?	
	8	Q	It was still in existence?		8	A It was right around the time that, um -- I	
	9	A	Yes.		9	don't know necessarily it was around time that things	
10:17:26	10	Q	Okay. And is there something particular -- in	10:19:32	10	went south, but it was right around the time where the	
	11		particular that prompted you to file a Certificate of		11	nature of what David was doing, vis-a-vis Integrated	
	12		Dissolution?		12	Administration, changed.	
	13	A	No, I just was -- you know, I think there		13	Q All right. And what exactly was your	
	14		was -- one of the reasons I had kept it open was there		14	understanding of what David was doing with Integrated	
10:17:38	15		was some -- the investigations and -- and potential	10:19:47	15	Administration at that time?	
	16		litigation that was going on. Once that all got settled		16	A David was doing deals, working on many	
	17		and went away, I didn't want to pay the \$800 a year, an		17	transactions. He was the guy who was the primary funder	
	18		keep records and corporate documents, so I instructed		18	of Integrated Administration. He was arranging funding	
	19		Majid to shut it down.		19	to pay for people. He would advance expenses for deals	
10:17:54	20	Q	Okay.	10:20:01	20	and then get paid back if he had advanced deals. He	
	21	A	And he's told me what to do and how to do it,		21	then set up another company called Cyrano, which I spoke	
	22		and I shut the company down.		22	to you about yesterday. And the people that worked	
	23	Q	Now, is it fair to say that at the -- that the		23	closely with him went on Cyrano payroll and started	
	24		time -- at the time that Integrated Administration		24	working at that company, and I had -- I was not a part	
10:18:03	25		stopped conducting business was, was that at or around	10:20:17	25	of that company officially.	

Page 26				Page 28			
10:20:21	1	Q So it's your position is that Mr. Bergstein was		10:22:36	1	A Yes, I do. Thank you.	
	2	doing all of that for your company, Integrated			2	Q Okay. And the money that was transferred to	
	3	Administration?			3	Swartz IP, that was referred to pursuant to the note	
	4	A He was doing that for IA, yes.			4	purchase agreement that you signed on behalf Swartz IP	
10:20:30	5	Q Okay. Now, if I could direct you back to page		10:22:47	5	in your capacity as Swartz IP's vice-president; is that	
	6	43 of Exhibit 1.			6	correct?	
	7	A Okay.			7	A I understand that that document was	
	8	Q I'm sorry, Exhibit 2.			8	instrumental in the transfer. He -- your colleague made	
	9	Is that your signature on bottom there?			9	that clear yesterday.	
10:20:41	10	A Yes, it is.		10:22:57	10	Q Okay. And are you aware that Integrated	
	11	Q And you signed this on or about July 1st, 2018?			11	Administration received more than \$2 million in payments	
	12	A Yes, sir.			12	from Swartz IP in connection with this transaction with	
	13	Q And you signed it under the penalty of perjury?			13	Class TT?	
	14	A Yes, sir.			14	A Yesterday your colleague pointed out	
10:20:49	15	Q Okay. So is everything in this document true		10:23:08	15	transactions that were slightly north of a million, and	
	16	and accurate to the best of your knowledge?			16	I'm sure there are other transfers, but I don't recall	
	17	A Yes, sir.			17	any of those tracks specifically.	
	18	Q Okay. And let's look at, um, Section 5 of this			18	Q Okay. I'm going to show you what was	
	19	document entitled "Required Statements."			19	previously marked as Exhibit 40 in connection with	
10:21:11	20	Dou see that?		10:23:25	20	Mr. Majid Zarrinkelk's deposition.	
	21	A Yes, I do.			21	A Okay. Do we need to share?	
	22	Q Okay. Has Integrated Administration been			22	MR. LATZER: Yes, I -- I don't have another	
	23	completely wound up and dissolved?			23	copy of it.	
	24	A As -- I think this was the last thing to do			24	MR. MIGLER: No problem.	
10:21:21	25	that, yeah.			25	///	
Page 27				Page 29			
10:21:22	1	Q Okay. And as of the time that you signed this		10:23:41	1	BY MR. LATZER:	
	2	document, had all final returns required under the			2	Q And I'm going to direct you to a particular	
	3	California Revenue and Taxation Code been filed or were			3	transaction, but are you able to tell me, generally,	
	4	to be filed with the California Franchise Tax Board?			4	what this is?	
10:21:37	5	A I believe so.		10:23:48	5	A It's a Wells Fargo Bank statement for	
	6	Q And had the known assets of Integrated			6	Integrated Administration, August 11th to August 24th of	
	7	Administration had been distributed to persons entitled			7	2011.	
	8	to them, or to the corporation, or had the corporation			8	Q Okay. So this exhibit consists of additional	
	9	acquired no known assets?			9	bank statements as well.	
10:21:47	10	A Um, I believe so. I don't know what assets I		10:24:04	10	Do you see on --	
	11	would have had.			11	A Yes, I see that.	
	12	Q Okay. As far -- you knew that -- did IA have			12	Q Okay. And to -- just to narrow our focus here,	
	13	any assets at time it was dissolved?			13	do you see on the top right of the first page there it	
	14	A Um, I don't think so.			14	says, "Page 2 of 127"?	
10:22:01	15	Q Okay. Now yesterday, with Mr. Walker, you		10:24:22	15	A I do.	
	16	discussed a transaction which the plaintiff in this			16	Q So I'm going to refer to those page numbers	
	17	matter, Class TT, transferred to Swartz IP,			17	when we look at this document.	
	18	\$17.7 million.			18	A Okay. No problem.	
	19	Do you recall that?			19	Q And -- and you agree with me that these are	
10:22:24	20	A Yes, I do.		10:24:28	20	bank statements for Integrated Administration's account	
	21	Q Okay. And just to be clear, by Swartz IP, I'm			21	ending in 12578? And the first statement is, as you've	
	22	referring to both Swartz IP Services Group and Advisory			22	described before, for the period of time between	
	23	IP Services.			23	August 11th, 2011 and August 24th, 2011?	
	24	A Okay.			24	A I do.	
10:22:34	25	Q Do you understand that?		10:24:42	25	Q Okay. And the last statement in this exhibit	

Page 30			Page 32		
10:24:45	1	is from --	10:27:16	1	things. I don't know specifically what was it doing. I
	2	A March 1st to March 31st, 2014.		2	did not form it. I did not run. I don't know
	3	Q Okay. Thank you.		3	specifically what it was set up to do.
	4	Okay. Let's take a look at page 17.		4	Q Okay. But Integrated Administration was your
10:25:07	5	A Okay. No problem.	10:27:25	5	company?
	6	Q Before I direct you to a particular		6	A That is correct.
	7	transaction, were you a signatory for this account?		7	Q Okay. So when this payment of \$150,000 hit
	8	A Yes, I was.		8	Integrated Administration's bank account on
	9	Q Okay. Did you establish this account?		9	November 23rd, 2011, did you question where it came from
10:25:21	10	A Yes. Either Majid or I did.	10:27:39	10	or why you were receiving it?
	11	Q Okay.		11	A I would -- David would be funding the company.
	12	A Majid would typically open the bank accounts.		12	You will see a lot of wires that came in that he
	13	Q Okay. Now, on page 17, I want to direct you to		13	arranged. I would tell him the company's financial
	14	the transaction at the bottom 11/23.		14	needs were in terms of how much was needed for payroll,
10:25:35	15	A Okay.	10:27:51	15	for bills, for rent, for phones, et cetera, and he would
	16	Q It's the first of the transactions dated 11/23.		16	arrange money to come in. And I would ask him what the
	17	A Okay.		17	money was, and how it should be logged, and that was our
	18	Q And it reflects a deposit into Administrate --		18	routine. It was my routine.
	19	into Integrated Administration's account for \$150,000		19	Q But it's your testimony that you're not aware
10:25:52	20	from Swartz IP Services Group, Inc.	10:28:03	20	of any, goods or services that Integrated Administration
	21	Do you see that?		21	provided Swartz IP in exchange for this payment?
	22	A I do.		22	A No, that's not what I said. What I said is, I
	23	Q What was this payment from Swartz IP to		23	don't know what David was doing with them. Maybe David
	24	Integrated for?		24	was providing the goods and services for them, maybe he
10:25:59	25	A I do not have any recollection about any of	10:28:21	25	was consulting for them, maybe he was working on deals.
Page 31			Page 33		
10:26:02	1	these individual transactions from back then.	10:28:21	1	I don't know what he was doing.
	2	Q Okay. Do you know if Integrated Administration		2	Q But you're not aware one way or the other?
	3	provided any goods or services to Swartz IP Services?		3	A I'm not aware of what he was doing.
	4	A Integrated Administration had 40 employees. I		4	Q Okay.
10:26:21	5	don't know in, on, or around this time, and David was	10:28:31	5	A I'm not aware of what he was doing.
	6	doing a lot of work with and Jerry Swartz, and I don't		6	Q Okay. Are you aware of whether Integrated
	7	know what David was or wasn't doing. Whatever he was		7	Administration issued an invoice related to this payment
	8	doing, as far as I'm concerned, he was doing stuff for a		8	from Swartz IP?
	9	multitude of companies, potentially including Swartz IP.		9	A There were some invoices issued. I don't
10:26:35	10	So that's my thought.	10:28:52	10	remember specifically what for, or how many, or when.
	11	Q Okay. Do you know if any of Integrated		11	Q Okay. Are you aware of any documents relating
	12	Administration's 40 employees were doing work for Swartz		12	to the purpose or reason why this \$150,000 was paid from
	13	IP?		13	Swartz IP to Integrated Administration?
	14	A I don't know what a lot of the employees were		14	A I don't know what David had with Swartz IP.
10:26:48	15	doing. I could tell you that there were 40 employees.	10:29:08	15	Maybe it's something that he did. He had paperwork. He
	16	Some were housed, not with us, at other places working		16	made a deal with them. I don't know the answer to that.
	17	on the medical billing. So the medical billing was a		17	Q Okay. Let's turn to the next page, page 18.
	18	business that uh, um, uh, was -- had a bunch of		18	A Okay.
	19	employees, and there was other things that David was		19	Q And the first transaction dated November 29,
10:27:02	20	doing. I don't what some of David's people were working	10:29:19	20	2011.
	21	on. Maybe they were working on things for Swartz IP. I		21	Do you see that?
	22	don't know.		22	A Yes, I do.
	23	Q Okay. But did -- you understood that Swartz IP		23	Q And that's another payment from Swartz IP
	24	was not a medical billing; did you?		24	Services Group to Integrated Administration.
10:27:15	25	A Swartz IP was a company that was funding	10:29:26	25	Do you agree with me?

		Page 34			Page 36
10:29:27	1	A I do.	10:31:52	1	A As David was funding the company, he was
	2	Q Okay. And do you have an understanding as to		2	arranging the funding. Jerry Swartz was a friend of
	3	why this payment was made?		3	his. They were doing a whole bunch of deals together.
	4	A No. No. I talked about this yesterday to the		4	I don't know what specifically what he was doing. And I
10:29:37	5	same statement I made yesterday.	10:32:02	5	would tell him how much money was needed, and he would
	6	Q Okay. And is it the same statement that you		6	fund what he could when he could, and tell me what to do
	7	just made to me before, and that's that you really don't		7	with the funding.
	8	know one way or the other why this payment was made or		8	Q Okay. And the same is true for the
	9	whether -- strike that.		9	February 9th, 2012 transfer?
10:29:50	10	You really don't know one way or the other	10:32:13	10	A That is correct.
	11	whether Integrated Administration provided any goods or		11	Q Okay. If you could turn to page 36.
	12	services to Swartz IP in exchange for this payment?		12	A Okay.
	13	A What I know is that David would fund IA, and		13	Q Now, on page 36, I want to focus your attention
	14	I'll say that again. I've said it a few times. David		14	on two transactions dated March 6, 2012. The first one
10:30:05	15	would arrange funding to come in to IA for the work IA	10:33:23	15	is \$63,167.
	16	was doing. I was not involved in where the money would		16	A 157, right -- 38, or whatever.
	17	come from, or how the money would come in. He would		17	Q I think it's \$167.36.
	18	arrange the wires, as you see. The wires would come in		18	A Okay.
	19	and he would tell me what to do with the money.		19	Q Do you see that one?
10:30:20	20	Q And you would do as he told you?	10:33:37	20	A I do.
	21	A Yes.		21	Q And the entry states, in part, "Online transfer
	22	Q Okay. Did you ask any questions?		22	to business checking account from IA to ZKCO for wire to
	23	A I would ask how to classify it so that I could		23	Carol Watson."
	24	keep our books and records clean.		24	A Okay.
10:30:30	25	Q Did you ask any questions as to the source of	10:33:49	25	Q Do you see that?
		Page 35			Page 37
10:30:33	1	the funds?	10:33:50	1	A Yes, I do.
	2	A I would typically just -- I would ask him for		2	Q Now, do you have an understanding as
	3	information on it, but typically wanted to know where it		3	to -- strike that.
	4	was income or not, and how to classify it so that Majid		4	ZKCO is Mr. Zarrinkelk's firm, or was his firm?
10:30:39	5	can file my taxes properly.	10:34:03	5	A Yes. Yes.
	6	Q Were you curious as to the source of the funds?		6	Q Okay. Do you have an understanding as to why
	7	A No. At the time, I had no reason to question		7	Integrated Administration was using Mr. Zarrinkelk's
	8	it.		8	firm in this instance to facilitate the transfer to the
	9	Q Okay. Let's turn to page 31, please.		9	Carol Watson?
10:31:14	10	A Okay.	10:34:16	10	A That's how wires would -- would be done. I
	11	Q And I want to direct you to two transactions on		11	would send him an e-mail for a wire that needed to go
	12	this page, February 2nd, 2012 and February 9, 2012.		12	out, and he would move the funds because he could wire
	13	Do you see the --		13	from his own account online so I wouldn't have to drive
	14	A Okay. I do.		14	to the branch and fill out a form. So he would move it
10:31:28	15	Q -- the first transaction for February 2nd,	10:34:28	15	to his account, and from his account wire it to wherever
	16	2012, it's a transfer from Swartz IP Services Group to		16	he was instructed to do so.
	17	Integrated Administration, \$50,000?		17	Q Okay. So he would, in -- in certain instances,
	18	A I see that, yes.		18	facilitate these wires for you?
	19	Q Okay. And do you have any understanding as to		19	A That is correct.
10:31:42	20	why Swartz IP was sending this money to Integrated	10:34:38	20	Q Okay.
	21	Administration?		21	A If not, I would have to go to the branch.
	22	A The -- the same thing, as I said before. I'm		22	Are you done with this one?
	23	going to say the same thing about every single one of		23	Q Yeah. Okay. Let me show you what I've marked
	24	these transactions.		24	as Exhibit 3.
10:31:52	25	Q Okay.	10:35:10	25	(Exhibit 3 was marked for

		Page 38		Page 40
10:35:10	1	identification by the Court Reporter	10:37:59	1 on February 9th --
	2	and is attached hereto.)		2 A I do.
	3	BY MR. LATZER:		3 Q -- a transfer from Swartz IP for \$150,000 to
	4	Q Are you able tell me what this document is?		4 Integrated Administration.
10:35:24	5	A It's a list of wire transfers, Pineboard and IA	10:38:06	5 A I do.
	6	from Wells Fargo, and the second page is IA transfers		6 Q And that's also reflected on Exhibit 3?
	7	and dates.		7 A It is.
	8	Q Okay. Now this is a document that Integration		8 Q Okay. And if you turn to page 36, please, the
	9	Administration produced in discovery in this case. It's		9 first transaction at the top of --
10:35:49	10	Bates numbered 1756 to 1757; is that correct?	10:38:43	10 A I see it.
	11	A Yes, sir.		11 Q -- the first page reflects a \$300,000 payment
	12	Q Okay. Now, is this -- well, who put this		12 from Swartz IP to Integrated Administration.
	13	document together?		13 A I see it.
	14	A I don't remember.		14 Q Okay. And that's also reflected on this
10:36:04	15	Q Okay. Is this one of Integrated	10:38:52	15 document that's been marked as Exhibit 3.
	16	Administration's records?		16 A That's it.
	17	A I don't know what it is.		17 Q Okay. So do you agree with me that this
	18	Q Have you ever seen this document before?		18 appears to reflect the various transfers of monies
	19	A I don't remember. Maybe.		19 that --
10:36:15	20	Q Do you agree with me that this reflects the	10:39:02	20 A Yes, I do.
	21	transfers of monies from Swartz IP to Integrated		21 Q -- Integrated Administration received from
	22	Administration?		22 Swartz IP?
	23	A It says "Pineboard funding," so no. But you --		23 A According to the first few that we have look
	24	we just went through some wire numbers together a minute		24 at, yes.
10:36:33	25	ago. There's a \$300,000, a 150,000, so it could be. I	10:39:08	25 Q Okay. And was it your understanding that the
		Page 39		Page 41
10:36:37	1	don't know.	10:39:13	1 purposes of the payments from Swartz IP to Integrated
	2	Q Okay. Well, let's take a look. If you can		2 Administration were for Pineboard funding?
	3	turn back to what was marked as Exhibit 40 of		3 A This is probably the -- uh, what David had told
	4	Zarrinkelk's deposition.		4 us to log it as. That's what I think this would be, but
10:36:47	5	A Got it.	10:39:29	5 I don't know.
	6	Q And if we can look back at page 17.		6 Q Okay. And what did you understand that to
	7	A Okay.		7 mean, Pineboard funding?
	8	Q Do you see a \$150,000 transfer from Swartz IP		8 A What David told me to write in there, and then
	9	to Integrated Administration?		9 hopefully later on he would have expanded or explained
10:37:07	10	A I do.	10:39:40	10 it.
	11	Q And this document that we've marked today as		11 Q Okay. So these were placeholders for you?
	12	Exhibit 3, reflects a \$150,000 transfer --		12 A I don't know who -- I don't know what this
	13	A It does.		13 document is. I don't know who created it. I don't when
	14	Q -- from -- or to Integrated Administration.		14 it was created, so I don't -- I'm not prepared to answer
10:37:19	15	A It does.	10:39:53	15 that.
	16	Q Do you see that?		16 Q Okay. But it is a document that you produced
	17	A I do.		17 in discovery?
	18	Q Okay. And let's look at page 18.		18 A Okay.
	19	Do you see that on 11/29/2012, there was a		19 Q Do you disagree with that?
10:37:30	20	\$300,000 transfer?	10:39:59	20 A No.
	21	A I do.		21 Q Okay.
	22	Q Okay. And that's also reflected on what's been		22 A If you say I produced it, I believe you.
	23	marked as Exhibit 3?		23 Q Do you know how you would have come into
	24	A It is.		24 possession of this document?
10:37:37	25	Q Okay. And if you look at page 31, you'll see	10:40:05	25 A No. I have no recollection of that.

Page 42				Page 44			
10:40:08	1	Q Okay. Now did there come a point in time where		10:42:21	1	the ones on the first page? I don't understand these to	
	2	you developed an understanding as to what "Pineboard			2	be that. This is just a document, so there were	
	3	funding" meant?			3	transfers on that date.	
	4	A I don't remember.			4	Q Okay. Do you know if this is a document that	
10:40:27	5	Q Okay. As you sit here today, do you have an		10:42:34	5	Mr. Zarrinkelk put together?	
	6	understanding of what it meant?			6	A I don't know who put this together. I don't	
	7	A Funding from Pineboard -			7	recall.	
	8	Q Okay.			8	Put this away?	
	9	A -- or related to Pineboard somehow.			9	Q Yes.	
10:40:34	10	Q Now you testified yesterday that Pineboard		10:42:53	10	A This one, too?	
	11	Holdings was set up as an investment vehicle; is that			11	Q You can put that away, too.	
	12	correct?			12	I'm showing you Exhibit 4.	
	13	A Yes, that's my understanding.			13	(Exhibit 4 was marked for	
	14	Q Okay. And you were an officer at Pinebold --			14	identification by the Court Reporter	
10:40:44	15	board Holdings?		10:42:59	15	and is attached hereto.)	
	16	A Yes. Yes			16	BY MR. LATZER:	
	17	Q And what sort of investments did Pineboard			17	Q And this is an e-mail dated November 17, 2011,	
	18	make?			18	from you to Ray Shahab and Mr. Zarrinkelk?	
	19	A Pineboard was funded, I think, by the Weston			19	A Yes.	
10:40:52	20	guys. They -- they funded that, and they would instruct		10:43:13	20	Q Do you see that?	
	21	us what to do with the money, they and David.			21	A I do.	
	22	Q Okay. So let me ask it again.			22	Q Okay. And Mr. Shahab, I believe you testified	
	23	What sort of investments it made?			23	yesterday, was an employee of Mr. Zarrinkelk?	
	24	A I don't remember what Pineboard did			24	A That's correct.	
10:41:02	25	specifically besides they did a bunch of work for		10:43:19	25	Q And he lost his CPA license because he	
Page 43				Page 45			
10:41:02	1	Sovrin, medical billing. They looked at other deals.		10:43:22	1	embezzled client monies; is that correct?	
	2	David and the Weston guys were in touch all the time.			2	A I -- I don't know what he did. I know he did	
	3	They were doing insurance stuff. They were doing all			3	something that was not cool, and Majid reported him,	
	4	kinds of stuff that I don't know.			4	and, I believe, took his license away.	
10:41:17	5	Q Okay. Do you know whether Pineboard provided		10:43:33	5	Q Okay. And Mr. Zarrinkelk, you characterized	
	6	any goods or services to Swartz IP?			6	him as a friend, family member, accountant, business	
	7	A I don't know what David and the Weston guys			7	manager?	
	8	were doing vis-a-vis Swartz IP. I was an officer at			8	A Yes.	
	9	Pineboard because I was the guy in the office that could			9	Q All of those things?	
10:41:36	10	sit there and -- and administer it. Whatever needed to		10:43:40	10	A Yes, sir.	
	11	be administered.			11	Q Okay.	
	12	Q It you could turn to page 2 of this Exhibit 3.			12	A He's a great great guy.	
	13	A Okay.			13	Q Subject of this e-mail that you wrote is	
	14	Q And this reflects a transfer of funds to			14	"cash."	
10:41:54	15	Integrated Administration on December 8th, 2011 for		10:43:47	15	Do you see that?	
	16	\$250,000.			16	A I do.	
	17	Do you see that?			17	Q Okay. What did that mean?	
	18	A I do.			18	A Had to do with money.	
	19	Q And another transfer on January 9th, 2012, to			19	Q Okay. And the first line of the body of the	
10:42:04	20	Integrated Administration for \$30,000.		10:44:08	20	e-mail you write, "There has been a wire for \$290,000	
	21	Do you see that?			21	sent to Integrated Administration. It will hit	
	22	A I do.			22	tomorrow."	
	23	Q Okay. Do you understand that these were, as we			23	Do you see that?	
	24	saw in the first page, transfers from Swartz IP?			24	A Yes, I do.	
10:42:17	25	A Uh, I -- I don't. But are these the same as		10:44:17	25	Q Okay. And did you have an understanding at the	

Page 46				Page 48			
10:44:19	1	time of the source of this \$290,000 that was coming into your company?		10:46:41	1	(Exhibit 5 was marked for identification by the Court Reporter and is attached hereto.)	
	2				2		
	3	A I don't recall, but I don't think so.			3		
	4	Q Okay. And the e-mail continues, "Please do the following. Leave 47,500 of the wire in IA and transfer the balance of 204,500 to KJM immediately."			4	BY MR. LATZER:	
10:44:31	5			10:46:42	5	Q And this is a November 23rd, 2011 e-mail from you to Mr. Bergstein; is that correct?	
	6				6		
	7	Did I read that correctly?			7	A Yes, sir.	
	8	A Yes, you did.			8	Q And the first line of the e-mail you write,	
	9	Q Okay. And KJM is K.Jam Media?			9	"Buzz when you can. Please have a Q re the G for you."	
10:44:50	10	A Yes, sir.		10:47:02	10	Did I read that correctly?	
	11	Q And that's your company?			11	A You did.	
	12	A We've established that.			12	Q Okay. What did you mean by "a Q re the G for you"?	
	13	Q Okay. And so you're directing your accountant to transfer \$242,500 of these \$290,000 that were sent to IA to K.Jam Media?			13		
10:45:05	15	A Correct.			14	A I have a question regarding the G. I don't know what I was referring to about the G," but I say,	
	16	Q Okay. And then if you continue down, let's continue with the parenthetical there. It says, "The 47 in IA will cover payroll and taxes as well as the warehouse folks and Jeff Solomon. I will send you a detailed breakdown tomorrow."			15	buzz me when you can. I have a question regarding the for whatever for you.	
10:45:24	20				16	Q Your testimony is you don't what you meant by "the G"?	
	21	Did I read that correctly?			17	A I don't.	
	22	A Yes, you did.			18	Q Okay.	
	23	Q Okay. And Jeff Solomon is a reference to a gentleman who's -- I believe you described yesterday as			19	A Let me keep reading. Maybe it will refresh my memory.	
10:45:34	25				20	Q Sure.	
					21	A Well, this was the kind e-mail I was referring	
Page 47				Page 49			
10:45:35	1	an attorney of yours?		10:47:38	1	to yesterday when your colleague was asking, are there	
	2	A He was working at IA at the time. Yes, he is an attorney.			2	any e-mails about this. This is exactly the kind of	
	3				3	e-mail I was talking about.	
	4	Q Okay. And is he also a friend of yours?			4	Q Do you have an understanding from reviewing the	
10:45:42	5	A Yes, he is.		10:47:48	5	e-mail in its entirety what you meant by "the G"?	
	6	Q Okay. And the e-mail continues, "Once the 242,500 is in KJM, I will need you to make an online transfer of 13,327 to Pagoda. I need to send a wire tomorrow for that amount."			6	A I don't.	
	7				7	Q Okay. Let's look at the second line. "Please	
	8				8	also look at the Steve O docs this weekend."	
	9				9	Do you see that?	
10:45:59	10	Do you see that?		10:47:56	10	A Yes.	
	11	A Yes.			11	Q Do you know what you meant by "Steve O docs"?	
	12	Q I read that correctly?			12	A Yes. Steve O docs, there was an animation	
	13	A Yes, you did.			13	studio we were looking at. There was a business plan we	
	14	Q Okay. And Pagoda is another one of your companies; correct?			14	were looking at for the -- for this project that was	
10:46:05	15				15	headed by a gentleman named Steve Oedekerk, who's a director, filmmaker and friend of mine. We met with him	
	16	A Yes, it was another company.			16	on a number of occasions to do a deal with him.	
	17	Q Okay. And you're -- you were an officer of that company?			17	Q Okay. Did anything become of that?	
	18				18	A Not yet.	
	19	A Yes.			19	Q That's still ongoing?	
10:46:11	20	Q Okay. Were you the sole owner of that company?			20	A I still believe in it. I'm still trying.	
	21	A I don't remember. I don't think so. I don't know.			22	Q Okay. Was Mr. Bergstein involved in that at all?	
	23	Q Okay.			23	A No, sir.	
	24	A I don't remember.			24	Q The e-mail that you wrote continues, "In order	
10:46:32	25	Q Let's look at what I've marked as Exhibit 5.			25		

Page 50				Page 52			
10:48:34	1	to catch up next week, we will need 175. This will be 2 payroll, the outstanding bills, rent, medical insurance, 3 parking, et cetera, Amex, the landscaping and the 4 antiques, and 50 to my loan."		10:50:35	1	A Yes, I do. 2 Q Does that refer to your landscaping and 3 antiques? 4 A No, sir.	
10:48:51	5	Do you see that?		10:50:38	5	Q What's that a reference to? 6 A Probably his charges on the Amex. I wanted to 7 let him know what I was referring to. What the charges 8 were. 9 Q Okay. And then the "50 to my loan," what are you referring to there?	
	6	A Yes, I do.		10:50:47	10	A I had -- I would loan the company money to the 11 extent that the company needed it when there was no 12 money in. I would -- I had arranged loans from people 13 like Majid a number of times, and also with myself, take 14 cash advances on my credit card, or whatever I needed to 15 do, to make sure payroll, and medical insurance, and 16 parking, and things like that were met. 17 Q Okay. And you said you -- 18 A And then he would pay me back. He would 19 arrange for me to get paid back -- 20 Q You said -- 21 A -- every so often. 22 Q -- you said you would loan the company. What 23 company are you referring to? 24 A Either one, whichever needed the money.	
10:48:56	10	Were you discussing Integrated Administration 11 in this context?		10:51:09	20		
	12	A No. I was telling him how much money we needed 13 to pay our bills.		10:51:13	25		
	14	Q Okay. And were you going to pay those bills 15 from Integrated Administration's account?					
10:49:05	15	A Some from IA, some from -- from K.Jam Media, 16 depending on what the bill was. The lease was this 17 K.Jam Media's name, so the lease would typically go from 18 K.Jam Media and those kinds of things.					
10:49:19	20	Q And you're referring to the lease for the 21 office that you shared with Mr. Bergstein?					
	22	A Yes, sir.					
	23	Q Now, there's a reference here to Amex; is that 24 correct?					
10:49:30	25	A Yes, there is.					
Page 51				Page 53			
10:49:30	1	Q Okay. And you testified yesterday that you 2 have or had a -- a black Amex card?		10:51:16	1	Q Either one is Integrated Administration or 2 K.Jam Media? 3 A Yeah. 4 Q Okay. And the next line of the e-mail you 5 wrote, "That should leave us a thousand bucks that I 6 want to use to get your patio furniture." 7 Do you see that?	
	3	A I did.		10:51:26	5		
10:49:39	4	Q And I believe you said this was the highest		10:51:39	10		
	5	level status that a member of American Express can have?		10:51:39	11		
	6	A That was the case back then, I think.		10:51:39	12		
	7	Q Okay. And you also testified that you used 8 that Amex card for personal expenses; right?		10:51:39	13		
	9	A I used it for personal and business, yes.		10:51:39	14		
10:49:54	10	Q Okay. So in this e-mail you're requesting 11 \$175,000; is that correct?		10:51:55	15		
	12	A I'm telling him that there's \$175,000 in bills 13 to get caught up. That's what I'm saying.		10:51:55	16		
	14	Q Okay. And are you -- you're also advising 15 Mr. Bergstein that, at least a certain amount of that 16 money, needs to go towards your black Amex card; is that 17 correct?		10:51:55	17		
	18	A I'm telling him that was probably part of the 19 175 to get caught up was an American Express card bill 20 that he had charges on.		10:52:06	18		
	21	Q And you had charged as well?		10:52:06	19		
	22	A Probably, yes.		10:52:06	20		
	23	Q And there's a reference there to the 24 landscaping and the antiques.		10:52:16	21		
10:50:32	25	Do you see that?		10:52:16	22		
				10:52:16	23		
				10:52:16	24		
				10:52:16	25		

				Page 54					Page 56
10:52:21	1	furniture?			11:06:20	1	don't --		
	2	A We eventually bought the patio furniture. I				2	Q Are there any documents among the ones that		
	3	don't remember if I bought it, or his office bought it,				3	you've produced in this litigation that could refresh		
	4	or how it got purchased. But he ended up with a few				4	your recollection?		
10:52:30	5	chairs and a table out on his patio, yes.			11:06:26	5	A I don't know.		
	6	Q Okay. What became of that furniture?				6	Q Okay. None that you're aware of as you sit		
	7	A I have no idea what he did with it.				7	here today?		
	8	Q Okay. He took it with him at some point?				8	A None that I'm aware of.		
	9	A I have no idea.				9	Q Okay. And let's look at the next payment.		
10:52:41	10	MR. LATZER: Okay. Let's take short break.			11:06:39	10	A Same page?		
	11	THE VIDEOGRAPHER: We're going off the record				11	Q Same page. March 13, 2012 there's a transfer		
	12	at 10:50 a.m.				12	of monies from Swartz IP to Integrated Administration		
	13	(A recess was taken.)				13	for \$50,000.		
	14	THE VIDEOGRAPHER: We're back on the record at				14	Do you see that?		
11:04:52	15	11:02 a.m.			11:06:49	15	A Yes, I do.		
	16	BY MR. LATZER:				16	Q And do you know what this payment was for?		
	17	Q Okay. Mr. Jam, I want to take you back to what				17	A I do not.		
	18	was marked as Exhibit 40 of Mr. Zarrinkelk's deposition,				18	Q Okay.		
	19	the bank records.				19	A And we can assume that's the case for these		
11:05:05	20	A Yes. Yes, sir.			11:06:56	20	transactions.		
	21	Q Okay. If you could turn to page 36, please.				21	Q Do you have an understanding as to the reason		
	22	A Yes, sir.				22	that the payment was made?		
	23	Q Okay. Let's look at the March 9th transaction				23	A I don't.		
	24	on that page, and it reflects a \$100,000 payment from				24	Q Okay. Do you know whether Integrated		
11:05:28	25	Swartz IP to Integrated Administration.			11:07:03	25	Administration provided any goods or services to Swartz		
				Page 55					Page 57
11:05:29	1	Do you see that?			11:07:05	1	IP?		
	2	A Yes, I do.				2	A My answer is not going to change.		
	3	Q Okay. And do you have an understanding as to				3	Q Okay. And as you sit here, are there -- I'm		
	4	what this payment was for?				4	correct that there are no documents that you can		
11:05:37	5	A No, I don't.			11:07:14	5	identify that would refresh your recollection as to		
	6	Q Okay.				6	those issues?		
	7	A I don't recall.				7	A I don't know.		
	8	Q Do you know if Integrated Administration				8	Q Specifically any documents that you produced in		
	9	provided any goods or services to Swartz IP?				9	discovery in this case --		
11:05:47	10	A My -- my answer's not going to change. I feel			11:07:26	10	A I don't --		
	11	like we've gone through that.				11	Q -- that would refresh your recollection?		
	12	Q Okay. And there are no records that would				12	A -- I don't know.		
	13	refresh your recollection as to the purpose of the				13	Q Let's look next page, page 37.		
	14	payment?				14	A Okay.		
11:05:57	15	A There could be records out there. I don't know			11:07:38	15	Q March 22nd, 2012 transfer of \$125,000 to		
	16	what's out there.				16	Integrated Administration from Swartz IP.		
	17	Q What records are you referring to?				17	Do you see that?		
	18	A As I said, I don't know what David was doing				18	A I do.		
	19	with other people, what he had in between them, what				19	Q Okay. Do you -- and you have no idea the		
11:06:07	20	agreements he had on behalf of Swartz IP. He was the			11:07:51	20	purpose of this payment?		
	21	president. He founded the company. And so I don't know				21	A No, I don't have any recollection of that.		
	22	what he had and what documents he might have in his				22	Q Okay. Is it your testimony at one point you		
	23	possession.				23	understood the purpose of this payment?		
	24	Q Do you have any documents in your possession?				24	A My -- my testimony has not changed. I feel		
11:06:18	25	A I don't. Whatever I have you guys have, so, I			11:08:02	25	like you've asked this question many times, and my		

Page 58				Page 60			
11:08:05	1	answer's always going be the same. I don't know where		11:09:47	1	Q That you would use placeholders to describe the	
	2	these monies were coming from and what they were coming			2	fund that were coming in from Swartz IP; is that	
	3	from. David was funding IA. David would arrange			3	correct?	
	4	funding into IA, and would tell me what to do with the			4	A Sometime -- no, what -- that is not correct.	
11:08:16	5	money when it came in. How much of it to spend on what		11:09:58	5	What David would tell me sometimes, he would say, it's	
	6	bills, payroll, et cetera. That's the case for all the			6	this or that. I would write that to Majid and say this	
	7	deposits, all the monies that he brought into Integrated			7	is what he said it was. That was the placeholder. It	
	8	Administration.			8	it wasn't necessarily money coming in from Swartz IP.	
	9	Q Okay. And you were the CFO of Integrated			9	It was any funding that he had arranged. And then later	
11:08:25	10	Administration; right?		11:10:09	10	we would try to get -- he would ask for the ledgers and	
	11	A I was the officer of Integrated Administration,			11	fill out exactly what was what, and how things tied to	
	12	yes.			12	one another.	
	13	Q But not just the officer, the chief financial			13	Q Okay. Let's look at the next transaction on	
	14	officer?			14	page 37. It's a -- dated March 26, 2012, and it's a	
11:08:32	15	A I was the officer of the company, yes.		11:10:33	15	\$40,000 transfer from Swartz IP to Integrated	
	16	Q Were you the chief financial officer?			16	Administration.	
	17	A I was listed as that in the documents, yes.			17	Do you see that?	
	18	Q Okay. So you were responsible for the --			18	A I do.	
	19	having an understanding of the monies that were coming			19	Q So you have no idea what this payment was for?	
11:08:42	20	in and out of this company?		11:10:45	20	A My answers are the same for all of these.	
	21	A I would ask him if it was income or not. I			21	Q Can you just answer the question?	
	22	would tell Majid whether it was income or not, and then			22	A No, I do not.	
	23	Majid can do the proper accounting to make sure			23	Q Okay. And as you sit here today, you don't	
	24	everything was done by the book.			24	know -- or sorry, you're not aware of any goods or	
11:08:53	25	Q You would only ask him whether it was income?		11:10:56	25	services that Integrated Administration provided to	
Page 59				Page 61			
11:08:54	1	A I would ask whether it was income, or what it		11:10:58	1	Swartz IP for this transfer?	
	2	was how to characterize the money that was coming in.			2	A Like I said, I don't know if any of the work	
	3	Q Okay. Did you ask for any documents to			3	that the employees were doing was for Swartz IP. I	
11:09:01	4	determine whether that was -- his characterization was			4	don't know what David Bergstein was doing for Swartz IP,	
	5	accurate or not?		11:11:05	5	what deals he had doing, what he was consulting on, what	
	6	A No. I don't remember doing that.			6	he was helping them with. I do not know what he was	
	7	Q Okay. And what -- as the -- as the CFO of			7	doing.	
	8	Integrated Administration, what did you understand your			8	Q Okay. And there are no documents or records	
	9	responsibilities to be?			9	that you can -- would refresh your recollection as to	
11:09:09	10	A I just passed all my accounting to the		11:11:19	10	that?	
	11	accounting firm and had them do all the accountings, and			11	A I haven't seen any. You can -- maybe David	
	12	make sure all the taxes were done, and all the books			12	Bergstein has documents.	
	13	were clean, and everything was ledgers and whatnot. So			13	Q Okay. Let's look at page 50.	
	14	I would pass everything over to my accountant.			14	A Just a second, please. Okay.	
11:09:24	15	Q And am I correct that that was done at some		11:11:47	15	Q And I want to direct your attention to the	
	16	point after all of the monies were received from Swartz			16	May 31st, 2012 transfer from Swartz IP Services Group to	
	17	IP?			17	Integrated Administration for \$200,000.	
	18	A Was done? What was done? Any time there was a			18	Do you see that?	
	19	a transaction, then I would notify him.			19	A Yes, I do.	
11:09:37	20	Q I understood your testimony before was that		11:11:57	20	Q Okay. And this is another transfer of funds	
	21	you -- what you described as a placeholder for the			21	for which, as you sit here today, you have no idea what	
	22	attorney --			22	the purposes of it was for?	
	23	A Sometimes he would give a placeholder, yes.			23	A It could have been to pay us back for employees	
	24	Q Let me just finish.			24	that were working on things that were related to Swartz	
11:09:46	25	A Sorry.		11:12:11	25	IP.	

Page 62				Page 64			
11:12:13	1	Q	Okay. What -- what employees are you referring to?	11:14:12	1	A	My answer is the same. I've answered that question probably ten times now.
	2				2		
	3	A	The employees of Integrated Administration at the time.		3	Q	Okay. But just with respect to this particular transfer, you're not aware of any --
11:12:24	4			11:14:21	5	A	My answer is the same.
	5	Q	Okay. And what services were they providing to Swartz IP?		6	Q	Just let me finish. You're not aware of any goods or services that Swartz IP provided Integrated Administration in exchange for this payment?
	6				7	A	My answer is the same.
	7	A	I don't know what they working on at the time.		8	Q	And that's that you don't know?
	8		Maybe one -- some of the things they were doing were related to Swartz IP, as I said earlier today.		9	A	My answer is the same as I -- you can rewind the tape. It's the same answer. I don't know what the employees were doing at the time, I don't know what David was doing at the time, what deals he was working on. He owned that company, he was the front, he called the shots. I don't know what he was working on with Jerry or anybody else. As far as I know, he was working on only deals for Swartz IP, and this is how the money was being generated. I do not know the answer to that question.
11:12:33	10	Q	You -- you don't know one way or the other?	11:14:31	10	Q	Okay. And there are no documents or records that would refresh your recollection in that regard?
	11	A	I don't know what they were working on at the time.		11	A	Not I know of.
	12				12	Q	Page 57, please.
	13	Q	You're just -- you're just speculating that perhaps employees of Integrated may have been working for Swartz IP?		13	A	Yes, sir.
11:12:39	14				14		
	15	A	I don't know specifically what the employees were doing on or around this time.		15		
	16				16		
	17	Q	Okay. Are you able to identify a single -- the name of a single Integrated Administration employee who was doing work for Swartz IP at this time?		17		
11:12:48	18	A	I don't know what they were doing at the time.		18		
	19	Q	Okay. But can you answer my question?		19		
	20	A	Are you able to identify a single Integrated Administration employee who was doing work for Swartz IP at this time?		20		
11:12:58	21				21		
	22	Q			22		
	23	A			23		
	24	Q			24		
	25	A			25		
Page 63				Page 65			
11:13:00	1	A	David Bergstein.	11:15:11	1	Q	And I want to direct you to three transactions on this page, July 2nd, July 11th, and July 13th.
	2	Q	Okay. What was he doing for Swartz IP?		2		
	3	A	I don't know. I've already told you I don't know what he was doing, but clearly he was doing a lot, because he was effectuating all this work.		3		
11:13:02	4				4		
	5	Q	Okay. And are -- I'm correct that there are no records that would refresh your recollection in this regard specifically with respect to this \$200,000 payment?		5		
	6	A	I don't know what's out there.		6		
	7	Q	Can you turn page 53, please.		7		
	8	A	Yes, sir.		8		
	9	Q	Do you see that?		9		
11:13:20	10				10		
	11	Q	And I want to direct you to the last transaction on this page, June 28, 2012. It's \$100,000 transfer into Integrated Administration from Swartz IP; is that correct?		11		
	12	A	Yes, that is correct.		12		
	13	Q	Okay. So this is another transfer of monies for which you don't know the purpose of?		13		
11:13:43	14	A	This was funding coming in that David had arranged, yes.		14		
	15	Q	Okay. You're not aware of any goods or services that Integrated Administration provided Swartz IP in exchange for this payment?		15		
	16				16		
	17				17		
	18				18		
	19				19		
11:13:54	20				20		
	21				21		
	22				22		
	23				23		
	24				24		
11:14:09	25				25		

				Page 66					Page 68
11:16:08	1	ten transactions that you've shown me.			11:18:05	1	increase in salary was warranted?		
	2	Q Okay. And to be clear, you don't know the				2	A He was the one who was bringing in the funding.		
	3	purpose for the transfers?				3	I didn't care if he increased his salary.		
11:16:14	4	A I don't know what David was doing, but David				4	Q Okay. Well, let me ask you this: Why was		
	5	was arranging this funding in. I don't know what he was			11:18:15	5	Mr. Bergstein receiving a salary in the first place from		
	6	working on, but David Bergstein arranged the funds to				6	Integrated Administration?		
	7	come in. He was in control of the Swartz IP company and				7	A Because he was doing a lot of work, and he was		
	8	accounts.				8	funding IA, and he wanted to be on the payroll.		
	9	Q Okay. And you're not aware of any documents or				9	Q And what do you mean by "he was doing a lot of		
11:16:24	10	records that would refresh your recollection as to the			11:18:26	10	work"? What work are you referring to?		
	11	purpose --				11	A He worked on all the transactions. He was		
	12	A I don't know what had David internally. As I				12	working with the Weston guys, he was working with		
	13	said, I don't know what documents David had, so I don't				13	Sovrin, he was working on a number -- on all kinds of		
	14	know.				14	transactions all day, all day every day.		
11:16:38	15	Q Okay. Let's look at what I've marked as			11:18:40	15	Q Do you know what his salary was before you		
	16	Exhibit 6.				16	requested an increase to \$300,000 per year?		
	17	A Put this away?				17	A I don't recall what it was.		
	18	Q Yes.				18	Q And you were receiving a salary from Integrated		
	19	(Exhibit 6 was marked for				19	Administration as well; right?		
11:16:59	20	identification by the Court Reporter			11:18:53	20	A On and off, yes.		
	21	and is attached hereto.)				21	Q Okay. And --		
	22	BY MR. LATZER:				22	A When there wasn't money I wouldn't take a		
	23	Q And this is an e-mail from you to				23	salary. There was plenty of times where everybody else		
	24	Mr. Zarrinkelk's employee --				24	got checks and I didn't.		
11:17:13	25	A Yes.			11:19:01	25	Q Okay. And what work were you doing for		
				Page 67					Page 69
11:17:13	1	Q -- dated November 29, 2011?			11:19:04	1	Integrated Administration that warranted a salary?		
	2	A Yes.				2	A I was in the office, I was -- I was the guy in		
	3	Q Do you see that? And the e-mail reads, "Hey,				3	the office. That's why I was an officer of a bunch of		
	4	Ray, increase his salary to 300K per year as of the next				4	these companies. I was the guy that had a guy to scan		
11:17:25	5	payroll starting Monday."			11:19:14	5	it. I had access to the copier. Nobody else was		
	6	Did I read that correctly?				6	around. David was always out. His voice mail was full		
	7	A Yes, you did.				7	by 7:00 a.m. The Weston guys lived in other states.		
	8	Q And the subject of the e-mail is David				8	That's why I ended up becoming -- they'd sign on a bunch		
	9	Bergstein?				9	of these companies. That's what I did. I was in the		
11:17:30	10	A That's correct.			11:19:28	10	office doing my work, trying to generate money to feed		
	11	Q So this is you requesting that Integrated				11	IA, and I did that myself.		
	12	Administration increase Mr. Bergstein's salary?				12	Q Okay. Is it fair to say that the work you were		
	13	A Yes. That is what this is.				13	doing was arranging for the transfers of monies that		
	14	Q Okay. And do you -- do you recall making this				14	Mr. Bergstein requested of you?		
11:17:43	15	request?			11:19:42	15	A Say that one more time?		
	16	A Not specifically, but this is my e-mail.				16	Q Is it fair to say that the work that you were		
	17	Q Okay. So do you recall what prompted you to				17	doing for IA was arranging for the transfers of monies		
	18	ask for an increase --				18	that Mr. Bergstein requested of you?		
	19	A I'm sure David asked me to do it.				19	A That was part of what I did, yes.		
11:17:52	20	Q Just let me finish.			11:19:50	20	Q Okay. What else did you do?		
	21	A Sorry.				21	A I made movies, I was developing stuff. I		
	22	Q Do you recall what prompted you to ask for an				22	consulted for Broadway 4D. I did whatever I could do to		
	23	increase in Mr. Bergstein's salary for your company?				23	try to generate money.		
	24	A David asked to have his salary increased.				24	Q And you consider that work that you were		
11:18:02	25	Q Okay. Is there -- do you recall whether an			11:20:01	25	performing for Integrated Administration?		

Page 70			Page 72		
11:20:03	1	A Yes.	11:22:27	1	A Yes.
	2	Q Making movies for Integrated Administration?		2	Q And you write, "Hey Dude. Just to refresh. As
	3	A I made movies. I used my salary to fund		3	you are looking up to divvy up the Pineboard cash,
	4	Integrated Administration. I wanted it to be a success.		4	payroll is 56, bills, including rent and Josh Furman
11:20:11	5	I took out loans myself to make sure people had health	11:22:41	5	Law, health insurance, parking, et cetera, is 53."
	6	insurance, health benefits, and the parking was paid so		6	Did I read that correctly?
	7	they had a place to park their car.		7	A Yes, you did.
	8	Q And you're referring to people who were		8	Q Okay. And is this referring to -- well, strike
	9	employed by Integrated Administration?		9	that.
11:20:24	10	A The office, yes.	11:22:54	10	There's a reference her to divvying up
	11	Q Okay. Are you referring -- did Integrated		11	Pineboard cash.
	12	Administration have individuals who were employed, who		12	A There was money in Pineboard, and I think
	13	actually performed work for Integrated Administration?		13	this -- obviously, as I've said repeatedly, when there
	14	A I don't know what you mean.		14	are funds, David would tell me where and how the money
11:20:37	15	Q Well, were they -- did it have employees who	11:23:05	15	to be spent. This is me pointing out to David that
	16	were, as you understood, performing work for other		16	there's \$56,000 needed for payroll, and \$53,000 needed
	17	entities?		17	for bills. I just wanted him to keep that in mind as he
	18	A Yes.		18	was deciding what was going to get paid.
	19	Q Okay. Did it have any employees who you		19	Q And is this -- this payroll, is that referring
11:20:45	20	understood were performing work strictly for Integrated	11:23:18	20	to IA's payroll?
	21	Administration?		21	A Yes.
	22	A Probably. I mean, Steve Piscula was always		22	Q Okay. And the bills, were those referring to
	23	around in the office making sure the office ran		23	IA's bills?
	24	properly, helping Frymi with whatever she was doing at		24	A This is all the bills. I don't know
11:20:59	25	the time. You know, my assistant worked for me doing	11:23:24	25	specifically what. I can just tell you that it included
Page 71			Page 73		
11:21:01	1	whatever I needed him to do. The receptionist was there	11:23:27	1	this stuff and other stuff. I don't know specifically
	2	answering the phones all day. That kind of stuff.		2	what bills were included, but, yeah.
	3	Q Okay. Did you receive any compensation for the		3	Q Okay. Well, there's a reference there to rent.
	4	officer positions that you held with K.Jam Media?		4	Is that referring to the rent that needed to be paid for
11:21:23	5	A If there -- did I receive compensation from	11:23:35	5	the office that you shared with Mr. Bergstein?
	6	K.Jam Media? I think my compensation primarily came		6	A Could be, yes.
	7	from K.Jam. Some of it probably came K.Jam Media, some		7	Q You're not sure?
	8	form IA.		8	A It could be the rent of the warehouse. We had
	9	Q Okay. How can K.Jam Productions?		9	a rent -- there was a warehouse that had stuff in
11:21:40	10	A Some K.Jam Productions. Because I think one or	11:23:41	10	storage in it. I don't know if it was the warehouse,
	11	two of the agreements I had were with K.Jam Productions,		11	but -- or the office. Maybe the office. Probably the
	12	so when money would come into K.Jam Production --		12	office. But I don't know what this e-mail from eight
	13	sometimes funds would come into that entity, yes.		13	years ago is referring to.
	14	Q Okay. You took a salary from K.Jam Media?		14	Q What warehouse were you referring to?
11:21:51	15	A I don't remember ever taking -- like, a regular	11:23:54	15	A There was a warehouse that was -- I don't when
	16	salary? No, I don't think so.		16	it was, around this time, maybe after this, there was a
	17	Q Okay. How about from K.Jam Productions?		17	warehouse that there were rent payments due on as well.
	18	A No. Not a regular salary.		18	Q Okay. And where was that warehouse located?
	19	Q Let's take a look at Exhibit 7.		19	A Somewhere in the Valley.
11:22:16	20	(Exhibit 7 was marked for	11:24:06	20	Q Okay. And what was the purpose of that
	21	identification by the Court Reporter		21	warehouse?
	22	and is attached hereto.)		22	A Storing stuff.
	23	BY MR. LATZER:		23	Q For?
	24	Q And this is an e-mail from you to Mr. Bergstein		24	A David's stuff. Some stuff for Ron Tutor.
11:22:23	25	dated February 22nd, 2012; is that correct?	11:24:15	25	Documents. Uh -- um, library stuff. All kinds of

		Page 74		Page 76
11:24:22	1	stuff.	11:26:22	1 identification by the Court Reporter
	2	Q Okay. And so in whose name was the warehouse		2 and is attached hereto.)
	3	space, I'll say, leased?		3 BY MR. LATZER:
	4	A K.Jam Media.		4 Q And this is a March 6, 2012 e-mail from
11:24:31	5	Q Okay. And how big was the space?	11:26:31	5 Mr. Bergstein to you; is that correct?
	6	A I don't remember how many square feet, but it		6 A Yes, it is.
	7	was a good size.		7 Q And Mr. Bergstein wrote, "Kia, I wired 300K to
	8	Q Okay. And who had access to the warehouse?		8 Integrated Administration."
	9	A David, myself, Frymi, and a couple of the guys		9 Do you see that?
11:24:45	10	that worked for David were there all the time.	11:26:44	10 A Yes, I do.
	11	Q What prompted you to obtain warehouse space?		11 Q Now did you understand the source of these
	12	A David and Ron needed the space. I just put it		12 monies that had been wired Integrated Administration?
	13	in -- he asked me to put it in K.Jam Media's name, and I		13 A No.
	14	did.		14 Q Okay. And did you -- well, strike that.
11:24:59	15	Q Okay. And do you still have that warehouse	11:27:08	15 As you sit here today, do you understand the
	16	space today?		16 source for these monies?
	17	A No. No, years and years ago it went away.		17 A No.
	18	Q Okay. How did it go away?		18 Q Okay. Let's look back at the bank records
	19	A They scanned all the documents, and got rid of		19 marked as Exhibit 40 of Mr. Zarrinkelk's deposition.
11:25:13	20	everything and got rid of the space. That's my	11:27:22	20 A Okay.
	21	understanding of what they did.		21 Q And let me direct you to page 36.
	22	Q So the warehouse space was mostly used for		22 A Okay.
	23	documents?		23 Q And the first transaction the top dated
	24	A There was a lot of documents in there, yes.		24 March 6, 2012, reflects, as we looked at before, a
11:25:18	25	Q And do you know what those documents were?	11:27:43	25 payment from Swartz IP Services Group to Integrated
		Page 75		Page 77
11:25:22	1	A Having to do the film libraries and other	11:27:45	1 Administration for \$300,000.
	2	stuff. I don't know. I don't know all the documents,		2 Do you see that?
	3	but I know a lot of the film stuff was in there.		3 A I do.
	4	Q Okay. So approximately when did K.Jam Media		4 Q Okay. So do you agree with me that this e-mail
11:25:35	5	stop leasing the warehouse space?	11:27:51	5 is referring to monies that came in from Swartz IP to
	6	A I don't remember.		6 Integrated Administration?
	7	Q Okay. And do you know how much was paid toward		7 A It seems like it.
	8	renting the warehouse space?		8 Q Okay. And by monies, I'm referring to
	9	A I don't remember how much the rent was.		9 \$300,000.
11:25:45	10	Q Okay. And there's a reference here to Joshua	11:28:02	10 A Yes, sir.
	11	Furman Law.		11 Q Okay. So Mr. Bergstein writes, "Upon receipt,
	12	Do you see that?		12 please wire out \$63,167.36 to," and then there's
	13	A Yes.		13 reference to Farmers and Merchants Bank.
	14	Q Who's that?		14 Did I --
11:25:51	15	A He's an attorney.	11:28:16	15 A Yes.
	16	Q And who did you perform work for?		16 Q -- read that correctly?
	17	A He performed work for David on a number of		17 A Yes.
	18	things, and also he did some work for CAC.		18 Q Okay. And the account name identified in
	19	Q Okay. CAC is your company?		19 Mr. Bergstein's e-mail is Carol Watson's Orange Coast
11:25:59	20	A It's one of my entities, yes.	11:28:19	20 Auctions."
	21	Q Okay. Did he perform work for you in any other		21 Do you see that?
	22	respects?		22 A Yes.
	23	A I don't think so.		23 Q Okay. So do you have an understanding as to
	24	Q Let's look at Exhibit 8.		24 what Carol Watson's Orange Coast Auctions is?
11:26:22	25	(Exhibit 8 was marked for	11:28:32	25 A No.

Page 78				Page 80			
11:28:32	1	Q Okay. Do you understand why Mr. Bergstein was asking you to use money that came from Swartz IP to pay Carol Watson's Orange Coast Auctions?		11:30:44	1	to Integrated Administration?	
	2				2	A No.	
	3				3	Q Okay. Let's look again at page 36 of	
	4	A No.			4	Exhibit 40.	
11:28:42	5	Q Did you ever have a discussion with Mr. Bergstein regarding this payment?		11:30:59	5	A Okay.	
	6				6	Q And you see on that page the March 13, 2012 transfer funds --	
	7	A I don't recall.			7		
	8	Q Did you understand that Mr. Bergstein was asking you to use Swartz IP's money to purchase			8	A I do.	
11:28:55	9				9	Q -- from Swartz IP to Integrated Administration	
	10	something from Carol Watson's Orange Coast Auctions for his personal use?		11:31:09	10	for \$50,000?	
	11				11	A I do.	
	12	A No.			12	Q So do you agree with me that this reference in	
	13	Q Okay. So as you sit here today, you have no idea why this payment was directed to Carol Watson's			13	Mr. Bergstein's e-mail is a reference to the monies that	
11:29:12	14				14	were -- that came in from Swartz IP Services Group?	
	15	Orange Coast Auctions?		11:31:20	15	A It seems like it.	
	16				16	Q Okay. Now the second sentence of that e-mail	
	17	A I don't.			17	states, "I need 20K sent to the trust."	
	18	Q Okay. Now let's look the last line of this e-mail. Mr. Bergstein wrote, "As to the rest, pay Amex			18	Do you see that?	
	19	and hold the rest for payroll first."			19	A Yes.	
11:29:24	20	Do you see that?		11:31:28	20	Q And that's a reference to Mr. Bergstein's	
	21				21	personal trust?	
	22	A Yes.			22	A Yes.	
	23	Q Okay. And by "pay Amex," that's a reference to paying off your American Express black card; is that			23	Q And as -- you understood that was a trust that	
	24	correct?			24	was in place to benefit his family?	
11:29:31	25	A That's the American Express card he's referring		11:31:37	25	A Yes.	
Page 79				Page 81			
11:29:32	1	to.		11:31:38	1	Q Okay. You responded to Mr. Bergstein that same	
	2	Q Okay. And that's the American Express card			2	day and you wrote, "Okay. I will arrange. Can I use	
	3	that, at least in part, was used to pay for your			3	the 30 for bills?"	
	4	personal expenses?			4	Did I read that correctly?	
11:29:39	5	A There was some personal expenses on it, yes.		11:31:51	5	A Correct.	
	6	I, at times, would write personal checks for my personal			6	Q Okay. And Mr. Bergstein responded, "There's an	
	7	expenses on top of that.			7	e-mail after this. 25 has to go out, 10 to trust, 15 to	
	8	Q Okay.			8	Graybox. The rest is yours."	
	9	A Or I would reduce my loan amounts by the			9	Did I see that -- did I read that correctly?	
11:29:49	10	personal expenses that were paid. It was all tracked.		11:32:04	10	A Yes.	
	11	Q Let's look at Exhibit 9.			11	Q And so when Mr. Bergstein wrote to you "the	
	12	(Exhibit 9 was marked for			12	rest is yours," that meant that you could use that money	
	13	identification by the Court Reporter			13	to pay off your American Express bill; is that correct?	
	14	and is attached hereto.)			14	A I used it for bills. Down here it says	
11:30:07	15	BY MR. LATZER:		11:32:18	15	"bills." I don't know what the bills were at the time,	
	16	Q And Exhibit 9 is a series of e-mails exchanged			16	but it was bills. Likely rent, you know, health	
	17	between you and Mr. Bergstein on March 13, 2012.			17	insurance or other insurance, phone, Internet -- bills.	
	18	Do you agree with me?			18	Q So when Mr. Bergstein wrote "The rest is	
	19	A Yes.			19	yours" --	
11:30:29	20	Q Okay. Let's start at the bottom, the first		11:32:37	20	A That means I can decide what -- you know, which	
	21	e-mail. Mr. Bergstein wrote to you, "I wired 50K to			21	of the bills get paid, 'cause it probably wasn't enough	
	22	Integrated Administration."			22	to pay all the bills, so I would call the phone company	
	23	Do you see that?			23	an say instead of 1,200 bucks, I'll pay you 800. Give	
	24	A Yes, I do.			24	me another two weeks. I would pay off the parking, or	
11:30:41	25	Q Now, do you know the source of that 50K payment		11:32:49	25	buy parking stickers so people could park in the	

Page 82				Page 84			
11:32:52	1	building or, you know, whatever. I would, you know, use 2 that -- whatever I could to pay the bills that were on 3 fire the most.		11:35:03	1	Q Okay.	
	4	Q It's fair to say when he wrote, "The rest is 5 yours" he was indicating to you that you could use the 6 money as you saw fit?			2	A That's that Steve started it as, yes.	
11:32:59	7	A I could use the money for the bills is what he 8 was indicating.			3	Q Okay. Now Mr. Piscula's e-mail, the bottom one	
	9	Q Where here does he refer to bills?			4	on page 1, he states, "This check was written today from IA."	
11:33:09	10	A My question is, "Can I use the 30 for bills", 11 and he says, "The rest is yours," meaning for the bills. 12 I used that money for the bills.		11:35:20	5	Did I read that correctly?	
	13	Q Okay. In the e-mail at the top, you responded 14 to Mr. Bergstein and you wrote, in part, "Mine. Yay."			6	A Yes.	
11:33:21	15	Is that correct?			7	Q Okay. And there's a reference on the next page of this document to Definity Media, Evan Warshawsky.	
	16	A Yes.			8	Q Okay. And so is it your understanding that at this time Integrated Administration was making a \$12,000 payment to Definity -- Definity Media?	
	17	Q Okay. In the next line you wrote, "I wonder if 18 there's a direct flight to Vegas from here," question mark.			9	A Correct.	
11:33:32	20	Do you see that?			10	Q Is that correct?	
	21	A I do.			11	A Yes.	
	22	Q Did you go with Mr. Bergstein to Las Vegas often?			12	Q And so is it your understanding that at this time Integrated Administration was making a \$12,000 payment to Definity -- Definity Media?	
	24	A I went to Vegas with David on probably two occasions, but this was just me joking here. I did not			13	A For Evan Warshawsky's services.	
11:33:39	25				14	Q Okay. Do you know what services he provided?	
					15	A He was providing accounting, CPA services for a multitude of the entities over the years. I don't know specifically what he was doing at this time.	
					16	Q Okay. Now, you responded to Mr. Piscula's e-mail also on April 13, 2012, and you wrote, "Was there an incoming wire? We don't fund for these checks. Zero float."	
					17	Q Okay. Now, you responded to Mr. Piscula's e-mail also on April 13, 2012, and you wrote, "Was there an incoming wire? We don't fund for these checks. Zero float."	
					18	Q Okay. Now, you responded to Mr. Piscula's e-mail also on April 13, 2012, and you wrote, "Was there an incoming wire? We don't fund for these checks. Zero float."	
					19	Q Okay. Now, you responded to Mr. Piscula's e-mail also on April 13, 2012, and you wrote, "Was there an incoming wire? We don't fund for these checks. Zero float."	
					20	Q Okay. Now, you responded to Mr. Piscula's e-mail also on April 13, 2012, and you wrote, "Was there an incoming wire? We don't fund for these checks. Zero float."	
					21	Q Okay. Now, you responded to Mr. Piscula's e-mail also on April 13, 2012, and you wrote, "Was there an incoming wire? We don't fund for these checks. Zero float."	
					22	Q Okay. Now, you responded to Mr. Piscula's e-mail also on April 13, 2012, and you wrote, "Was there an incoming wire? We don't fund for these checks. Zero float."	
					23	Q Okay. Now, you responded to Mr. Piscula's e-mail also on April 13, 2012, and you wrote, "Was there an incoming wire? We don't fund for these checks. Zero float."	
					24	Q Okay. Now, you responded to Mr. Piscula's e-mail also on April 13, 2012, and you wrote, "Was there an incoming wire? We don't fund for these checks. Zero float."	
					25	Do you see that?	
Page 83				Page 85			
11:33:43	1	go to Vegas here. I spoke to Majid, the wires are going 2 out. This was just me being -- trying to be funny in 3 the top. But on other occasions I went to Vegas with 4 David in a group, probably twice. Maybe three times 5 over the last --		11:36:11	1	A Yes.	
	6	Q And was the purpose of trips to Las Vegas?			2	Q Okay. Let me just ask you. Mr. Piscula, he has an e-mail address at kjammedia.com?	
11:33:57	7	A Socialization, fun, birthdays, that kind of things.			3	A He did at the time.	
	8	Q Gambling?			4	Q Okay. So he was an employee of your company, K.Jam Media?	
11:34:05	9	A I play a little bit of Black Jack, not big. A couple hundred bucks. I'm still not good at poker.			5	A No. That's just the e-mail he had. He was an employee of Integrated Administration.	
	10	Q Okay. Let's look at Exhibit 10.			6	Q Okay.	
	11	(Exhibit 10 was marked for identification by the Court Reporter			7	A He just didn't have an Integrated Administration e-mail thing.	
	12	and is attached hereto.)			8	Q Was Mr. Piscula ever employed K.Jam Media?	
11:34:25	13	BY MR. LATZER:			9	A No. K.Jam Media didn't have any employees.	
	14	Q And Exhibit 10 consists of various e-mails exchanged on April 13, 2012 and April 14, 2012.			10	Q Okay. Did he provide services to K.Jam Media?	
	15	Is that correct?			11	A Sure. He helped me.	
11:34:46	16	A Okay.			12	Q Mr. Piscula helped you?	
	17	Q Do you agree with me?			13	A Yes. He was the office manager of the office so, yes, he did help me.	
	18	A Yes.			14	Q Okay. But he was officially an employee of Integrated Administration; is that correct?	
	19	Q Okay. Now, the subject of these e-mails is Integrated Administration transaction; is that correct?			15	A Yes. That's where he got his paycheck.	
11:35:01	20	A That's what it says.			16	Q Okay. Now Mr. Bergstein responded to your e-mail on April 14th. He wrote, "We deposited 40K on Thursday."	
	21				17	Do you see that?	
	22				18		
	23				19		
	24				20		
	25				21		

		Page 86			Page 88
11:37:05	1	A I do.	11:39:20	1	Q Did you have an understanding of where 60K was
	2	Q Now, did you have an understanding as to the		2	coming from?
	3	source of those funds?		3	A No. I would assume that he said -- I spoke
	4	A No. I didn't even know the deposit had been		4	with him earlier that day and he mentioned something
11:37:13	5	made, clearly.	11:39:28	5	about the fact that he had wired in 60K.
	6	Q Okay. And you responded to Mr. Bergstein's		6	Q Okay. And is it your understanding that that
	7	e-mail that same day. You wrote, "Thanks Dude. Any		7	60K was going to be coming into Integrated
	8	love for Amex on Monday?"		8	Administration?
	9	Did I read that correctly?		9	A I don't know, based on this.
11:37:24	10	A Yes, you did.	11:39:39	10	Q Well, there's a reference here -- or two
	11	Q Okay. And by writing "Any love for Amex," that		11	references in this e-mail -- I'm sorry, three references
	12	was -- that was your question of whether funds from		12	to payroll.
	13	Integrated Administration could be payed to -- could be		13	A Uh-huh.
	14	used to pay off your American Express black card bill;		14	Q Was -- Integrated Administration was the
11:37:40	15	is that correct?	11:39:50	15	company that was being used to pay payroll --
	16	A No. That was me saying are you going to be		16	A Correct.
	17	able to make money available for American Express? I		17	Q -- is that correct?
	18	don't know if was going to be through IA, or an entity,		18	A Correct.
	19	or he was going to pay it directly. I don't know. This		19	Q Did any other company pay payroll?
11:37:49	20	is me reminding him that there's a payment due on the	11:39:55	20	A No, but the wire could have come into one of
	21	American Express, and is he going to do anything about		21	the other companies, to K.Jam Media, and I would have
	22	it. Trying to put it in front of his eye.		22	moved it to IA for payroll. So I don't know where the
	23	Q Okay. And to be clear, that was the American		23	60 came from, I don't know where it was sent, or if it
	24	Express black card bill that we've been referring to?		24	even arrived.
11:38:00	25	A That's the only one we'll refer to in all of	11:40:08	25	Q Okay. Now, the reference here for 250 for
		Page 87			Page 89
11:38:03	1	this for the rest of the day.	11:40:12	1	Amex, you're referring to \$250,000?
	2	Q Okay. And Mr. Bergstein wrote back to you on		2	A Yes.
	3	April 14, 2012, "Yes"?		3	Q Okay. And, again, that's monies that were
	4	A Yes.		4	going to be used to pay off the American Express black
11:38:09	5	Q Okay. And you responded, in part, on April 14,	11:40:24	5	card. That's -- that's correct?
	6	2012, "Sweet."		6	A It says there's \$250,000 due to American
	7	Is that correct?		7	Express, yes.
	8	A That's what it says.		8	Q Okay. So you're requesting monies to pay off
	9	Q Let's look at Exhibit 11.		9	the American Express black card?
11:38:35	10	A Thank you.	11:40:32	10	A I'm telling him what is needed to pay the
	11	(Exhibit 11 was marked for		11	bills, yes.
	12	identification by the Court Reporter		12	Q And just to be clear, it's the American Express
	13	and is attached hereto.)		13	black card?
	14	BY MR. LATZER:		14	A That is the only American Express card we're
11:38:43	15	Q And Exhibit 11 is an e-mail from you to Mr.	11:40:38	15	going to talk about today.
	16	Bergstein dated May 30th, 2012; is that correct?		16	Q Okay. Let's look at Exhibit 12.
	17	A Yes, it is.		17	(Exhibit 12 was marked for
	18	Q And you wrote, "Hey D.B., payroll is this week,		18	identification by the Court Reporter
	19	as you know. Assuming the 60K comes in today, as you		19	and is attached hereto.)
11:39:02	20	said, we will need 95 for payroll, 250 for Amex."	11:41:05	20	BY MR. LATZER:
	21	Did I read that correctly?		21	Q Exhibit 12 is a July 2nd, 2012 e-mail from
	22	A Yes, you did.		22	Mr. Bergstein to you; is that correct?
	23	Q Okay. Now the reference there to the 60 day --		23	A Yes, it is.
	24	excuse me, 60K coming in today; do you see that?		24	Q And the first sentence of the e-mail,
11:39:18	25	A I do.	11:41:27	25	Mr. Bergstein writes, "200K wire let to the IA account."

		Page 90		Page 92
11:41:33	1	Do you see that?	11:43:43	A It seems that way.
	2	A Yes.		Q You made a reference before to a company by the
	3	Q Do you understand that Mr. Bergstein meant that		name of Broadway 4D Theaters; is that correct?
	4	a 200K wire had been sent to the IA account?		A Yes.
11:41:41	5	A Sent or went probably, yes.	11:44:16	Q And I believe you referred to them yesterday
	6	Q Okay. Now, do you have an understanding as to		during testimony that you provided to Mr. Walker?
	7	the source of these funds?		A Yes, I did. Yes.
	8	A No.		Q Okay. And I believe you testified that it
	9	Q Okay. Let's look back at Exhibit 40.		would -- Broadway 4D is a project with which you'd been
11:41:52	10	A Okay. Page 36?	11:44:30	involved for many years; is that correct?
	11	Q No. Let's look the page 57, please.		A Correct.
	12	A Okay. Okay.		Q When did you first become involved in this
	13	Q And the first transaction on page 57 of		project?
	14	Exhibit 40 is dated July 2nd, 2012, and it reflects a		A Many, many years ago.
11:42:15	15	transfer from Advisory IP Services of \$200,000 to	11:44:38	Q Between five and ten?
	16	Integrated Administration; is that correct?		A Yeah.
	17	A I see that.		Q Okay. And what does that project entail?
	18	Q Okay. So do you agree with me that this		A It involves licensing some of the big numbers
	19	reference in Mr. Bergstein's July 2nd e-mail is		from the big Broadway musicals of history, and shooting
11:42:29	20	referring to monies that had come to Integrated	11:44:54	them on film in 3-D, and having big stars of today sing
	21	Administration from Swartz IP?		the respective songs from the big shows. It's kind of a
	22	A It seems that way.		theme park attraction, if you think about it. It's,
	23	Q Okay. So this is another instance in which		like, Madame Tussauds Museum. Instead of paying 26
	24	Integrated Administration is receiving monies from		bucks to see plastic people, you pay the entrance fee
11:42:41	25	Swartz IP?	11:45:12	and you sit, and for an hour you get to see some of the
		Page 91		Page 93
11:42:42	1	A It seems that way.	11:45:12	biggest numbers in the history of Broadway performed by
	2	Q Okay. And the second sentence of this e-mail		the biggest stars of today.
	3	Mr. Bergstein wrote, "When it comes in, pay Amex, and I		It's called Broadway 4D, because the theater
	4	will need a small wire sent out tomorrow."		will have some 4D elements like smell, and scent, and
11:42:53	5	Is that correct?	11:45:25	wind, and lights, and things of that sort.
	6	A That's what it says.		Q All right. So what's the status of this
	7	Q So this is another instance in which		project?
	8	Mr. Bergstein is directing funds from which you would		A Uh --
	9	use -- well, strike that.		MR. MIGLER: Counsel, I'm just -- I'm just
11:43:08	10	This is another instance in which Mr. Bergstein	11:45:31	going to object to any questions about Broadway just as
	11	is -- sending you funds from which the American		being outside of the scope of the depo subpoena, because
	12	Express black card would be paid.		we're about IA. Unless this is going towards anything
	13	Is that correct?		to do with IA, I'm going to object as to relevance to --
	14	A It seems that way, yes.		to Broadway 4D.
11:43:20	15	Q Okay.	11:45:48	MR. WALKER: Well, For what it's worth,
	16	A He would always direct what the money was to be		yesterday David said that if we had other questions
	17	spent on. I have said that already.		addressed to him individually, then we could ask him.
	18	Q And specifically, this is another instance in		MR. MIGLER: I wasn't aware of that, but go
	19	which funds were coming from Swartz IP, and those funds		ahead. Thank you.
11:43:30	20	were going to be used to pay off the American Express	11:45:58	MR. WALKER: Thank you.
	21	black card; is that correct?		BY MR. LATZER:
	22	A According to this e-mail, he requested that		Q Can you tell me what the status of the project
	23	some of that wire be used to pay off the American		is?
	24	Express bill, correct.		A Uh, the project is still in the works. They
11:43:40	25	Q All right. And the wire was from Swartz IP?	11:46:03	have a new director on board now, a very high profile

Page 94			
Page 96			
11:46:07 1	director is on board. The script is being rewritten and	11:48:03 1	you guys be okay with breaking now?
2	there's hope that the project's going to go in front of	2	THE WITNESS: I'm good for -- I can go work
3	cameras early next year.	3	through and be done with this early if you want, or we
4	Q What's your role with respect to this project?	4	can break for lunch. Whatever you gentlemen prefer.
11:46:18 5	A I am hopefully going to be the one who produces	11:48:08 5	MR. LATZER: Yeah, let's take a break. Thank
6	the actual movie part of it.	6	you.
7	Q Okay. Have you invested any money in this	7	THE VIDEOGRAPHER: Going off the record at
8	project?	8	11:46 a.m.
9	A No.	9	(A lunch recess was taken.)
11:46:27 10	Q Have any companies with which you're affiliated	12:47:50 10	THE VIDEOGRAPHER: We are back on the record at
11	invested money in this project?	11	12:46 p.m.
12	A Yes. I have friends that have invested in it,	12	BY MR. LATZER:
13	and I was a consultant for them, so they actually paid	13	Q Okay. And Mr. Jam, before we begin, I just
14	me.	14	want to say that I understand that this process can be a
15	Q What -- what, uh, companies are you referring	15	little bit tedious, and it may seem like I'm asking
16	to? These are your friends' companies?	16	repetitive questions. But I just want you to know that
17	A I'm sorry, what?	17	I'm asking the questions because I need to, and I just
18	Q You're referring to your friends' companies?	18	appreciate you bearing with me.
19	A For what?	19	A I appreciate that, and if I appear frustrated,
20	Q Your -- am I understanding that your friends'	20	I apologize.
21	companies invested in this project and you provided	21	Q I'm going to show you what I'm marking as
22	consulting to those companies?	22	Exhibit 13.
23	A No. I provided consulting services to Broadway	23	(Exhibit 13 was marked for
24	4D.	24	identification by the Court Reporter
25	Q Okay. So they've paid you?	25	and is attached hereto.)
Page 95			
Page 97			
11:46:59 1	A Yes.	12:48:48 1	BY MR. LATZER:
2	Q Okay. But you haven't invested any monies?	2	Q Have you seen this document before?
3	A I have not invested any money in it, no.	3	A I don't think so.
4	Q Understood.	4	Q Okay. This document was introduced as an
5	11:47:03 Are you aware that in December 2013 that Swartz	5	exhibit at Mr. Bergstein's criminal trial, and it was
6	IP transferred approximately \$40,000 to Broadway 4D	6	designated as Exhibit 46 during that trial.
7	Theaters?	7	Do you see that on the bottom right there?
8	A I wasn't, no. I'd forgotten if I did. I know	8	A I do.
9	Jerry was really in -- Jerry -- I do know that there was	9	Q Okay. Now, on the first page of this exhibit,
10	11:47:16 10 a lot of discussion between David and Jerry about Jerry	10	you see the box that says "Swartz IP Services Group"?
11	doing some very, very heavy lifting on -- on the show	11	A I do.
12	and providing a giant loan or something, and I don't	12	Q And then there's an arrow pointing to
13	think it ever happened. But there was a lot of	13	Integrated Administration.
14	discussion that David Bergstein and Jerry had with the	14	Do you see that?
15	Broadway 4D folks.	15	A Yes.
16	Q Okay.	16	Q And that reflects a payment of \$300,000 to
17	A I was not in those discussions. I don't recall	17	Integrated Administration.
18	them.	18	Do you see that?
19	Q Do you know why Broadway would have been -- or	19	A That's what it says.
20	11:47:36 20 did receive monies from Swartz IP?	20	Q Okay. And we just saw this payment reflected
21	A I don't what David and Jerry talked to Broadway	21	on a bank statement earlier today; is that correct?
22	4D about. I think he was going to be a big investor in	22	A I don't remember if it's this one, but we did a
23	it, Jerry was, I think. I don't know.	23	see \$300,000 payment. Yes, I will assume that's the
24	Q I'm at a pretty good stopping point. I don't	24	case.
25	11:48:01 25 know whether -- it's a little early for lunch, but would	25	Q Okay. And let me ask you to turn to the last

Page 98			Page 100		
12:50:10	1	page of this exhibit.	12:52:02	1	A I would assume it was paying back a loan.
	2	A Okay. Whoa. Okay.		2	Q Okay. Is there a loan agreement to reflect
	3	Q Now, you'll see again the box that designated		3	that?
	4	Swartz IP --		4	A I would not do a loan agreement for myself. If
12:50:24	5	A Yes.	12:52:14	5	the company was short money, to the extent that I had
	6	Q -- and an arrow going over to Integrated		6	money, I would transfer money into the company to pay
	7	Administration?		7	the bills or whatever needed to get paid. And then when
	8	A Yes.		8	I could, I'd take the money back. There's still plenty
	9	Q And that reflects the \$300,000 payment that we		9	of outstanding loans and debt, unfortunately.
12:50:31	10	saw on the first page --	12:52:27	10	Q Okay. The entry below K.Jam House, it says,
	11	A Okay.		11	"Cash 45K."
	12	Q -- correct?		12	A Uh-huh.
	13	A Yes.		13	Q Do you see that?
	14	Q Now, I want you to focus first on the arrow		14	A Yes.
12:50:39	15	going down from Integrated Administration.	12:52:34	15	Q Do you have an understanding as to why \$45,000
	16	A Okay.		16	in cash would have been drawn from the Integrated
	17	Q And you'll see the name Don Carroll.		17	Administration bank account on November 29, 2011?
	18	A Yes.		18	A I don't remember. No.
	19	Q Do you see that?		19	Q Is that cash that was in your possession?
12:50:50	20	A Yes.	12:52:48	20	A I don't know, but I don't think so.
	21	Q Now, this reflects various payments from		21	Q But you were the authorized signatory on the
	22	Integrated Administration to individuals and entities		22	account?
	23	including the first one, Mr. Carroll.		23	A Yes, I was.
	24	A Okay.		24	Q Okay. Is there anyone else other than
12:51:06	25	Q Is that correct?	12:52:57	25	Mr. Zarrinkelk who would have been able to draw \$45,000
Page 99			Page 101		
12:51:07	1	A That's what it says.	12:53:01	1	from that account?
	2	Q Okay. Now the second entry below Mr. Carroll		2	A Somebody who had a check.
	3	is K.Jam House.		3	Q But this is reflecting a cash withdrawal
	4	Do you see that?		4	from -- from the account.
12:51:18	5	A Yes.	12:53:10	5	A Right. You write a check to cash; right?
	6	Q And next to that reflects a \$15,000 payment		6	Q Can -- can you -- so is there anyone who could
	7	from Integrated Administration to K.Jam House.		7	have withdrawal cash directly from that account other
	8	Do you see that?		8	than you and Mr. Zarrinkelk?
	9	A Yes.		9	A No.
12:51:26	10	Q Okay. What's K.Jam House?	12:53:22	10	Q Okay. Now, the fourth -- I'm sorry, the fifth
	11	A I -- I don't know this is, but I have a house		11	entry down reflects a \$941,000 payment to --
	12	account called Kia Jam House account at Wells Fargo.		12	A \$941 payment.
	13	It's probably referring to that, but I don't know what		13	Q I'm sorry. Thank you for correcting me.
	14	this document is, or who drafted it or what -- you know,		14	A \$941 payment to Mr. Zarrinkelk's firm; is
12:51:39	15	so that's my best guess.	12:53:41	15	that correct?
	16	Q Okay. The K.Jam House account, that's an		16	A Yes.
	17	account you use for personal expenses?		17	Q Okay. Let's look at the arrow, the next arrow
	18	A Yes.		18	to the right, from Integrated Administration, and it
	19	Q Okay.		19	goes down to K.Jam Media.
12:51:47	20	A That's the account that typically would loan	12:53:53	20	A Yes.
	21	Integrated Administration money if they were short on		21	Q Do you see that?
	22	bills.		22	A I do.
	23	Q Okay. Do you know why Integrated		23	Q And that reflects an \$89,000 payment to K.Jam
	24	Administration would have been paying K.Jam House		24	Media from Integrated Administration?
12:51:59	25	\$15,000 on November 29, 2011?	12:54:00	25	Do you see that?

Page 102			Page 104		
12:54:00	1	A I do see that's what it says.	12:55:58	1	Q That's the name of a law firm?
	2	Q Okay. And K.Jam Media is your company; right?		2	A Yes, it is.
	3	A Yes, it is.		3	Q Okay. Did you have a relationship with that
	4	Q Okay. And if you look at the box that says		4	law firm?
12:54:12	5	K.Jam Media, there's an arrow that goes below, and then	12:56:05	5	A Yes, sir.
	6	there are a list of five individuals, or entities, the		6	Q Okay. And what services did they perform for
	7	first one of which is --		7	you?
	8	A The one that says 8,000?		8	A They perform entertainment legal services.
	9	Q Just let me finish. There's a reference first		9	Q Okay. And were they performing services for
12:54:27	10	to K.Jam House.	12:56:15	10	K.Jam Media at this time?
	11	Do you see that?		11	A They've performed services for me on and off
	12	A Yeah.		12	for the last 15 years.
	13	Q Okay. And K.Jam House you described before as		13	Q Okay. That includes this time period?
	14	your house account?		14	A I would assume so, yes.
12:54:35	15	A Yes.	12:56:30	15	Q Okay. What's Assured employee benefits?
	16	Q And you use that account for -- at least in		16	A One of the insurance policies, I don't remember
	17	part, for personal expenses?		17	if the next two are bills that would come in, I don't
	18	A Yes.		18	remember specifically what for, but they were, I think,
	19	Q Okay. Who's Allen Lee, the name underneath		19	insurance policies or some sort of insurance or
12:54:45	20	K.Jam House?	12:56:46	20	something. I don't remember specifically.
	21	A Allen Lee was a consultant that worked for the		21	Q Okay. So for whom were they providing services
	22	company on and off. He was a financial consultant that		22	for at this time?
	23	would create PowerPoints to financial models,		23	A I don't remember specifically.
	24	projections that David was working on.		24	Q Do you know if they were providing services for
12:54:57	25	Q Okay. He said he worked for the company. What	12:57:00	25	K.Jam Media?
Page 103			Page 105		
12:54:58	1	company are you referring to?	12:57:00	1	A I said I don't know specifically.
	2	A He worked for -- he got paid by various		2	Q Okay. You're not sure if they were providing
	3	entities, and he was working for David directly. On one		3	services for Integrated?
12:55:09	4	or two occasions he might have done things at my		4	A I said I don't remember. My answer is pretty
	5	request, but he mostly worked for David's -- at David's	12:57:08	5	clear.
	6	request.		6	Q Okay. How about Merrill & Associates?
	7	Q Did he do work for K.Jam Media?		7	A The same think. That's the same thing as
	8	A He did at some point. I asked him to do some		8	Assured. They were one of those monthly bills. I don't
	9	projections on a financial model for a film slate, I		9	remember specifically what for.
12:55:19	10	think. I don't remember exactly, but yes, he'd done	12:57:15	10	Q Okay. Now if you look to the arrow from K.Jam
	11	some work for K.Jam Media.		11	Media to the right, you'll see a reference to K.Jam
	12	Q Okay. Did anyone have -- were there any		12	Productions.
	13	written agreements reflecting the consulting services		13	A Correct.
	14	that Mr. Lee provided?		14	Q So that's another one of your companies?
12:55:32	15	A I don't remember. There's probably an invoice	12:57:26	15	A Yes, it is.
	16	somewhere for this money that was paid to him.		16	Q And above that arrow there's an indication that
	17	Q Okay. Do you remember whether with respect to		17	\$32,000 was paid from K.Jam Media to K.Jam Productions.
	18	this November -- or strike that.		18	Do you see that?
	19	Do you recall whether with respect to this		19	A I do.
12:55:45	20	transfer from K.Jam Media to Mr. Lee, whether it was for	12:57:38	20	Q Okay. And just to be clear, as it's depicted
	21	services provided to K.Jam Media?		21	in this document, that money is coming from the initial
	22	A I don't recall specifically what he did seven		22	\$300,000 was transferred from Swartz IP to Integrated
	23	years ago.		23	Administration.
	24	Q Okay. What's Business Affairs Inc.?		24	Do you see that?
12:55:57	25	A That's a law firm.	12:57:54	25	A That's what this document states. Yes.

Page 106				Page 108			
12:57:56	1	Q Okay. And for K.Jam Productions, if you look at the arrow going down, the first entry is "L.A. DWP," and there's an indication that \$247 was paid.	4	Do you see that?	12:59:44	1	one of them or not.
12:58:10	5	A I do.	6	Q Okay. What's L.A. WDP [sic]?	2	Q Okay. Is earthquake insurance something that you're required to have for your house?	
	7	A The Department of Water and Power.	3	A I don't know if I'm required to have it or not, but I have it.	4	A I don't know if I'm required to have it or not, but I have it.	
	8	Q Okay. So was that a payment for your water and power bill?	5	Q Okay. So this -- and you would make earthquake insurance payments monthly?	6	Q Okay. So the next entry here reflects a \$127 payment to DirecTV?	
12:58:20	10	A It was for a water and power bill. I don't know if it was for me or for the office. I don't know.	11	A I don't know if it's monthly or quarterly. I don't know.	7	A I don't know.	
	12	Q Which office are you referring to?	8	Q Okay. You have no recollection of that?	8	Q Okay. And the next entry here reflects a \$127 payment to DirecTV?	
	13	A The office -- wherever we were officed at the time.	9	A I don't know.	9	Do you see that?	
12:58:31	15	Q Colorado Boulevard?	10	A I do.	10	Q Okay. Did you have DirecTV at this time?	
	16	A Could be. Yes.	11	A At my house I did, yes.	11	A At my house I did, yes.	
	17	Q Okay. Well, at this time were you using K.Jam Productions to pay your personal water and power bill?	12	Q Okay. So does this reflect a payment of \$127 for that DirecTV?	12	Q Okay. And was it for the DirecTV at your house?	
	18	A K.Jam Productions was paying some of my personal bills, yes.	13	A It does reflect the \$127 payment to DirecTV, yes.	13	A I could be.	
12:58:43	20	Q And that would include --	14	Q Okay. Did you use K.Jam Productions to pay for	14	Q Okay. Did you use K.Jam Productions to pay for	
	21	A It could. I just don't know this document. I don't remember these amounts. You're asking me to verify fractions on a document from eight -- seven, eight years ago that I have not generated, I'm looking	25				
Page 107				Page 109			
12:58:57	1	at for the first time. So I don't know specifically which department of water and power that was. Could it have been my house? Yes. Could it have been something else? Yes. I don't know specifically any of those things from seven years on this document you're just putting in front of me.	2	the DirecTV at your house?	13:00:28	1	A K.Jam Media Productions was used to pay my bills, but specifically for back then, I don't remember, but I would assume so.
	3	Q What's the California Earthquake Authority?	2	A K.Jam Media Productions was used to pay my bills, but specifically for back then, I don't remember, but I would assume so.			
	4	A It's the California Earthquake Authority. I don't know.	3	Q It was used to pay your personal bills?			
12:59:06	5	Q Okay. Well, why would a payment have been coming from K.Jam Productions to the California Earthquake Authority for \$684 at this time?	4	A Yes, it was.			
	6	A I don't know. Maybe it's my earthquake insurance.	5	Q Okay. Who's Daniel Gunning?			
	7	Q Do you have earthquake insurance?	6	A He's a lawyer.			
12:59:15	10	A I believe I do.	7	Q Okay. And was he performing services for you at this time?			
	11	Q Okay. And is that insurance that you have for yourself personally?	8	A He's performed services for me on and off over the years, yes.			
	12	A For my house.	9	Q Okay. Do you recall why you would have made a \$250 payment to him at this time?			
	13	Q For your house?	10	A As I said, he was doing work from me, and I'm sure I owed him 250 bucks and I paid him.			
12:59:28	15	A Yes.	11	Q Okay. But you have no specific recollection as to the nature of that work?			
	16	Q Okay. Would the office have had earthquake insurance?	12	A The work had to do with, uh -- the last thing he did for me was a matter involving a judgment that I have against somebody for -- for something from many, many years ago.			
	17	A I don't know. The office had a bunch of insurances. I don't know if earthquake insurance was	13	Q That's the last work that you recall him doing for you?			
12:59:35	20	18	14	A Yes.			
	21		15				
	22		16				
	23		17				
	24		18				
12:59:41	25		19				
			20				
			21				
			22				
			23				
			24				
			25				

		Page 110			Page 112
13:01:23	1	Q And that was for you personally?	13:03:23	1	and is attached hereto.)
	2	A Yes.		2	BY MR. LATZER:
	3	Q Okay. And do you believe that that was the		3	A Okay.
	4	work he was performing at this time?		4	Q And it Exhibit 14 is another exhibit introduced
13:01:28	5	A I believe so.	13:03:30	5	by the government at Mr. Bergstein's criminal trial, and
	6	Q Okay. So was that the last time he performed		6	this one is designated Exhibit 47.
	7	work for you?		7	Do you see that?
	8	A That matter is ongoing.		8	A I do.
	9	Q That matter is still ongoing?		9	Q Okay. Have you seen this document before?
13:01:37	10	A Yes.	13:03:40	10	A No.
	11	Q And what's the nature of that matter?		11	Q Now, we see on first page here, a transfer from
	12	A It's, uh -- I have a judgment against this guy		12	Swartz IP Services Group to Integrated Administration
	13	and I've been trying to collect on forever, and he's		13	for \$250,000 on December 8th, 2011.
	14	helping to do that.		14	Do you see that?
13:01:45	15	Q And how much is that judgment for?	13:03:59	15	A That's what it says.
	16	A 40,000 bucks, I think, 40 something.		16	Q Okay. And this is one of transfers that's
	17	Q That's a judgment that you obtained in your		17	reflected on the bank statement that we reviewed before?
	18	name personally?		18	A If you say so.
	19	A I believe so. Yes.		19	Q Let me ask you this. At -- at or around this
13:01:56	20	Q Okay. The arrow from K.Jam Media going up	13:04:24	20	time frame, did Integrated Administration have any other
	21	toward the right, you see there's a reference to \$8,000?		21	bank accounts other than this Wells Fargo account ending
	22	A I do.		22	in 1578?
	23	Q And the circle there connecting to that arrow		23	A No.
	24	has your name; correct?		24	Q It didn't?
13:02:18	25	A Yes, it does.	13:04:33	25	A I don't think so. It had a savings account
		Page 111			Page 113
13:02:18	1	Q And underneath that there's a reference to	13:04:36	1	attached to this, I think, at the time, but that's all I
	2	"credit card, 1K."		2	can remember right now.
	3	Do you see that?		3	Q Okay. Do you know if that savings account
	4	A I do.		4	received any monies from Swartz IP?
13:02:25	5	Q So that was -- or this is indicating that	13:04:45	5	A I don't. It was not an active account. It
	6	\$1,000 went toward the credit -- a credit card bill?		6	just kind of sat there. When you open one, you get the
	7	A That's what it seems to say.		7	other, I think.
	8	Q And that's the black Amex card that we've been		8	Q Okay. Can you turn to the last page of this --
	9	referring to?		9	A Yes, sir.
13:02:38	10	A I have no idea.	13:04:53	10	Q -- please?
	11	Q Okay. I believe you testified earlier that the		11	A Okay.
	12	only credit card we would see today is the black Amex?		12	Q Okay. So on the last page, we again see what
	13	A The only Amex we would talk about is the black		13	was reflected on the first page, and that's that there
	14	Amex. This could have been another credit card.		14	was a payment from Swartz IP Services Group to
13:02:49	15	Q Okay. Did -- you had other credit cards in	13:05:08	15	Integrated Administration for \$250,000 on December 8,
	16	your name at that time?		16	2011.
	17	A Yes, I did.		17	Do you see that?
	18	Q Okay. And approximately how -- how many other		18	A Yeah.
	19	credit cards?		19	Q Okay. Now, if you can look at box that states
13:02:55	20	A I have no idea.	13:05:19	20	Integrated Administration, you will see a number of
	21	Q More than five?		21	arrows going from that box?
	22	A Don't know.		22	A Yes, I do.
	23	Q Okay. Let's look at Exhibit 14.		23	Q Okay. Now the arrow pointing down toward the
	24	(Exhibit 14 was marked for		24	bottom right reflects a \$44,000 payment from Integrated
13:03:23	25	identification by the Court Reporter	13:05:32	25	Administration to K.Jam Media.

Page 114				Page 116			
13:05:33	1	Do you see that?		13:07:28	1	Q Okay. Were you making a \$40,000 salary at this	
	2	A I do.			2	from Integrated Administration?	
	3	Q So that's a \$44,000 payment to your company?			3	A I would get paid very intermittently. This	
	4	A That's correct.			4	could have been a payment and I maybe didn't have a	
13:05:39	5	Q Do you know why Integrated Administration would		13:07:38	5	payment for the six months before that. So I'm assuming	
	6	have been paying K.Jam Media \$44,000 at this time?			6	that's what maybe all or part of this was for. I don't	
	7	A So many of the bills were in K.Jam Media's			7	know. Maybe part of it it's a loan payback, I don't	
	8	name, like I said, including the rent, the office, the			8	know. But I'm just pointing out that my personal	
	9	lease for the copier, et cetera, et cetera. So probably			9	paycheck would be written from Integrated Administration	
13:05:52	10	covering bills that way.		13:07:50	10	to K.Jam Productions. And when there wasn't money, I	
	11	Q So from your perspective, you really didn't			11	wouldn't take a check --	
	12	care at this time where money was coming from as long as			12	Q Okay.	
	13	you had the money to pay the bills?			13	A -- which was more often than not.	
	14	A David was providing the funding. I didn't			14	Q All right. I believe you testified that you	
13:06:13	15	question him where the money was coming from. I trusted		13:07:58	15	received a salary from Integrated Administration	
	16	him at the time. I would ask for money. When he			16	intermittently?	
	17	provided money, he would tell me how much to go to which			17	A Yes.	
	18	entity and what to do with it.			18	Q And when there was money there, you'd take it?	
	19	And in this case, I'm assuming this \$44,000			19	A Yes.	
13:06:22	20	that went K.Jam Media was to pay corporate bills,		13:08:06	20	Q Okay. So can you tell me, approximately, how	
	21	including rent and, you know, insurance, and health			21	much per month during the times you were receiving a	
	22	insurance, and office, and blah, blah.			22	salary that you were -- that you were being paid?	
	23	Q Okay. Would any of the K.Jam Media payments			23	A What my salary was?	
	24	gone toward any personal expenses?			24	Q Yes.	
13:06:36	25	A I don't know, maybe. I don't know. I don't		13:08:17	25	A My total salary was probably around 250,000,	
Page 115				Page 117			
13:06:41	1	recall.		13:08:17	1	200, \$250,000, if I were to get all the checks.	
	2	Q But at that time there were -- there would be			2	Q And that's \$250,000 per year?	
	3	certain instances where payments would go from K.Jam			3	A Per year. I'm guessing that amount. I don't	
	4	Media toward personal expenses?		13:08:32	5	remember specifically, 200 or 250,000. Something like	
13:06:49	5	A Maybe. Yeah.			6	that.	
	6	Q Now the next arrow from Integrated			7	Q And your testimony is that salary would have	
	7	Administration reflects a \$40,000 payment to Kia Jam			8	been paid to Kia Jam Productions?	
	8	Productions.			9	A Yes.	
	9	Do you see that?			10	Q Okay. Is there another -- are there any other	
13:06:59	10	A Uh-huh. I do.		13:08:41	11	reasons why \$40,000 would have been transferred for --	
	11	Q Okay. Do you know why Integrated			12	to Integrated -- from Integrated Administration to Kia	
	12	Administration would be transferring \$40,000 to Kia Jam			13	Jam Productions?	
	13	Productions at this time?			14	A As I articulated, I don't remember	
	14	A No. It could have been my payroll. My			15	specifically, but it could have also been a loan	
13:07:09	15	payroll, actually, would be written Kia Jam Productions,			16	payback. Maybe Kia Jam Productions gave a loan to	
	16	so that's what this could have been. I don't recall.			17	Integrated Administration for bills or payroll in the	
	17	Q You're referring to your payroll. What do you			18	weeks or months before. I don't remember specifically	
	18	mean by that?			19	that happened often.	
	19	A When I would get a paycheck, the check would be			20	Q So there's a lot of money moving around at this	
13:07:18	20	written out Kia Jam Productions.		13:09:05	21	time?	
	21	Q And who would you get a paycheck from?			22	A You -- you see what's happening.	
	22	A Integrated Administration.			23	Q U-huh. And there's money flowing from one	
	23	Q You're saying a paycheck for your salary			24	entity to the next, and they're entities which you and	
	24	personally?		13:09:18	25	Mr. Bergstein were affiliated or had an interest; is	
13:07:28	25	A Yes.				that correct?	

				Page 118					Page 120
13:09:18	1	A	I am -- I have -- these three entities are		13:12:06	1	discussed earlier, a payment of \$50,000 from Swartz IP		
	2		entirely mine. David Bergstein doesn't own any of these			2	Services to Integrated Administration on February 2nd,		
	3		entities. And yes, my entities would loan money to the			3	2012?		
	4		other entities, to IA if it needed money. If I had			4	A That's what it seems to do, yes.		
13:09:24	5		money, I would loan money to IA when it needed money to		13:12:16	5	Q Okay. Let's turn, if you can, to the second to		
	6		make payroll, and health insurance, and parking, and			6	the last page of this exhibit.		
	7		things of that sort. That's what small businesses do.			7	A Yes, sir.		
	8		Q What do small businesses do?			8	Q And this, again, reflects the payment that we		
	9		A You take care of your business, if you can. If			9	just discussed, and that's the \$50,000 payment from		
13:09:44	10		I had \$5,000 in my account and Integrated Administration		13:12:32	10	Swartz IP to Integrated Administration on February 2nd,		
	11		needed \$5,000 to make sure the parking gate would open,			11	2012.		
	12		people could come and park, I would advance the money as			12	Do you see that?		
	13		a loan to the company, and when the company had money,			13	A Okay. I do.		
	14		it would pay me back.			14	Q And then you see the two arrows, one to K.Jam		
13:09:55	15		If we were short for payroll, I would advance		13:12:42	15	Productions and the other to K.Jam Media?		
	16		the money, if I had it, so we can make payroll, people			16	A I do.		
	17		could get paid, people could have health benefits.			17	Q Okay. So this first arrow going down reflects		
	18		Q Did Kia Jam Productions pay any of the bills			18	that at this time Integrated Administration paid \$33,000		
	19		that you were referring to before that Integrated			19	to K.Jam Media.		
13:10:18	20		Administration had?		13:12:58	20	A Okay.		
	21		A I don't remember. Maybe K.Jam Productions			21	Q Do you see that?		
	22		loaned money to IA to pay the bills, or how it got paid,			22	A I do.		
	23		I don't remember from seven years ago.			23	Q Do you know the purpose of that payment from		
	24		Q Let's look at Exhibit 15.			24	Integrated to K.Jam Media?		
13:10:53	25		(Exhibit 15 was marked for		13:13:05	25	A It says on here, according to this document,		
				Page 119					Page 121
13:10:53	1		identification by the Court Reporter		13:13:07	1	that it paid for the rent, the parking, the IT guy,		
	2		and is attached hereto.)			2	office supplies, the phone bill and \$13,000 to my house		
	3		BY MR. LATZER:			3	account.		
	4		Q And Exhibit 15 is another exhibit introduced at			4	Q Okay. So let's look at that. \$13,000 went		
13:10:59	5		Mr. Bergstein's criminal trial. The exhibit was		13:13:19	5	toward the K.Jam House account.		
	6		numbered 50, and it was introduced by the government.			6	Do you see that?		
	7		Have you seen this document before?			7	A I do.		
	8		A No, sir.			8	Q And --		
	9		Q Okay. And you'll see on the first page of this			9	A I'm assuming that's paying back a loan that I		
13:11:13	10		exhibit, a payment, or what reflects a payment from		13:13:28	10	had given to the company.		
	11		Swartz IP Services Group of \$50,000 to Integrated			11	Q Okay. Why are you assuming that?		
	12		Administration on February 2nd, 2012.			12	A Because this document is from six years ago,		
	13		Do you see that?			13	and that's my best recollection of it.		
	14		A That's what the document says.			14	Q But you also testified earlier that K.Jam House		
13:11:27	15		Q Okay. Do you recall a payment from Swartz IP		13:13:39	15	was an account that you used for personal expenses?		
	16		to Integrated of \$50,000 at this time?			16	A Right. But that's the account that I would use		
	17		A I think -- didn't we talk about this one			17	also to loan money to the company if the company needed		
	18		already? I think we went through all of these			18	money.		
	19		individually already, didn't we, or are these new			19	Q Okay. But this could have been paying back		
13:11:37	20		transfers?		13:13:50	20	personal expenses?		
	21		Q So if you look back at Exhibit 40, page 31, you			21	A No.		
	22		see a payment of \$50,000 from -- on February --			22	Q It couldn't have been?		
	23		A I do. I think we talked about this already,			23	A Paying back personal -- no. It either -- I		
	24		earlier before lunch.			24	either got paid by getting a paycheck to K.Jam Media.		
13:12:03	25		Q Okay. So this -- this reflects what we		13:13:58	25	That was how I got paid. Money going to the house		

Page 122				Page 124			
13:14:01	1	account, this was most likely a loan payback, but I'm 2 not sure.		13:15:30	1	A Adam was one of the IT guys. Adam, at the time 2 was, I believe, doing some web work for the company. I 3 think.	
	3	Q Okay. And there's a reference to a \$658 4 payment to Verizon.			4	Q For what company?	
13:14:08	5	Do you see that?		13:15:39	5	A For either K.Jam Media or I don't know what 6 else he was doing. But he was a IT guy, so he did IT 7 work. But he did some web work for me, yes.	
	6	A Yes, I do.			8	Q I believe you testified yesterday that 9 Mr. Bergstein's friend, Mr. Carroll was also providing IT work?	
	7	Q And what -- what was that payment for?			10	A Yes, he did.	
	8	A I don't know. I think that was -- our phone 9 bill at the office was Verizon, I think. I'm not sure.			11	Q What -- what was the nature of the work he 12 provided?	
13:14:17	10	I don't recall.			13	A He did -- he handled all the phones and IT 14 work. There was another guy, Farden, who provided IT 15 work. There was always multiple parties doing IT work 16 for the companies.	
	11	Q Was Verizon the phone provider at the office?			17	Q How come you needed so much IT work?	
	12	A I think so.			18	A I don't understand that business. It needs --	
	13	Q Was Verizon the phone provider for you 14 personally?			19	stuff needed to get done, and we would hire people to 20 come and do the work that needed to get done. The 21 phones were all online, too, some voiceover phone IT 22 system thing.	
13:14:25	15	A No, I don't think so. I had AT&T at the house, 16 or something else. I don't think it's Verizon.			23	Q And there's a reference here to a payment of 24 \$273 to Office Depot.	
	17	Q Did you have Verizon back at this time, in 18 2012?			25		
	19	A I haven't changed my home phone bill in a long 20 time. This was, I believe a company.					
13:14:33	20	Q How about your cell phone?					
	21	A My cell phone was AT&T.					
	22	Q And was it AT&T at this time?					
	23	A It's been with AT&T for a very long time.					
13:14:43	24	Q Okay. Have you ever had Verizon as a phone					
	25						
Page 123				Page 125			
13:14:45	1	provider?		13:16:28	1	Do you see that?	
	2	A I think at the office it was Verizon, yes.			2	A I do.	
	3	Q Okay. What's Colorado or -- I'm sorry, C. A. 4 Colorado Center?			3	Q And do you know K.Jam Media would have been 4 paying \$273 to Office Depot at this time?	
13:14:52	5	A That's the office rent. That's the name of the 6 landlord where we wrote the check to for the office rent 7 for the Colorado rent space.		13:16:37	5	A Probably to buy office supplies for the office. 6 Paper, staples, pens.	
	8	Q Okay. So you were paying \$15,000 per month in 9 rent?			7	Q And that's the office that you shared with 8 Mr. Bergstein?	
13:15:01	10	A Yes, sir.			9	A That's the only office, yes.	
	11	Q And that was for the office that you shared 12 with Mr. Bergstein?		13:16:48	10	Q Okay. Now up top, the reference to Kia Jam 11 Productions, we see that \$18,000 went from Integrated 12 Administration to Kia Jam Productions.	
	13	A That is correct.			13	Do you see that?	
	14	Q And the charge, the standard parking for 15 \$3,000, what's that?			14	A Correct. I do. I see that.	
13:15:08	16	A That's for parking in the building where the 17 office was.		13:16:58	15	Q Okay. And then there was a payment of \$18,000 16 to Mr. Zarrinkelk?	
	18	Q Okay. And so how --			17	A That's correct.	
	19	A We get a number of spots per month. We had to 20 pay for the number of parking spots that we had so that 21 the employees could have a place to park.			18	Q Okay. Do you know why Mr. Zarrinkelk would 19 have been receiving \$18,000 Kia Jam Productions at this time?	
13:15:20	22	Q Do you recall approximately how many spots you 23 had?			21	A I'm going to guess Mr. Zarrinkelk loaned money 22 to me all the time when I needed money for company 23 stuff. He probably loaned Kia Jam Productions the 24 money, I moved the money to IA, and then IA paid me back 25 and I paid him back. That's what I'm guessing it was.	
	24	A No, I don't.					
13:15:29	25	Q Okay. Who is Adam Dunode?					

				Page 126					Page 128
13:17:26	1	Q	Did you have any -- at any point in time when		13:19:41	1	Integrated Administration, the first of which is toward		
	2		Mr. Zarrinkelk loaned money, did you have any agreement,			2	the top, a \$5,000 payment to K.Jam Media.		
	3		written agreement, reflecting that loan arrangement?			3	Do you see that?		
	4	A	On once -- on one or two occasions I believe we			4	A Yes.		
13:17:39	5		did, but on 98 percent of the occasions, we did not. I		13:19:50	5	Q Okay. Now, do you know why Integrated would		
	6		would just call him and ask him and he would graciously			6	have been making a \$5,000 to the K.Jam Media at this		
	7		agree to help me. He has been doing that for years.			7	time?		
	8	Q	Does he still do that today?			8	A I'm sure to pay bills.		
	9	A	He's a good man. I'm sorry?			9	Q And whose bills are you referring to?		
13:17:51	10	Q	Does he still do that today?		13:20:02	10	A Corporate bills, company bills, Kia Jam Media		
	11	A	To the extent that he can, and I ask him, yes,			11	bills probably.		
	12		I still owe him a little bit of money. Yes.			12	Q And there's another arrow goes to the right of		
	13	Q	Let's look at Exhibit 16.			13	the K.Jam Media box, and it's -- reflects a payment of		
	14	A	Okay.			14	\$750 to T-Mobile?		
13:18:16	15		(Exhibit 16 was marked for		13:20:14	15	Do you see that?		
	16		identification by the Court Reporter			16	A That's correct. Yes.		
	17		and is attached hereto.)			17	Q So --		
	18	BY MR. LATZER:				18	A I think my cell phone was -- I had a T-Mobile		
	19	Q	And Exhibit 16 is another exhibit from			19	cell phone as well. I think somehow that, as I said		
13:18:20	20		Mr. Bergstein's criminal trial. This is a government		13:20:21	20	earlier, AT&T -- AT&T is my current carrier. Back then		
	21		Exhibit 53.			21	it might have been T-Mobile. I think I just remember,		
	22		And on first page here you see a \$300,000			22	when I switched to an iPhone, I had to switch to AT&T.		
	23		payment from Swartz IP Services Group to Integrated			23	So I want to correct what I said a few minutes ago about		
	24		Administration that was on March 6, 2012?			24	my cell -- my personal cell phone.		
13:18:37	25	A	I see that.		13:20:32	25	Q Fair enough. So you think that this was a		
				Page 127					Page 129
13:18:38	1	Q	Okay. And this is one of the payments that		13:20:36	1	payment for your personal cell phone bill?		
	2		we've previously looked at on the bank statements?			2	A My company cell phone.		
	3	A	If you say so.			3	Q It's your accompany cell phone?		
	4	Q	Let's take a look at page 36 of Exhibit 40.			4	A What I would use for work, yes.		
13:18:59	5	A	Okay.		13:20:43	5	Q Okay. And you use it for personal use, too?		
	6	Q	Do you see the first transaction on that page			6	A Of course.		
	7		reflects a transfer of \$300,000 --			7	Q Okay. And what's the Office of Finance, the		
	8	A	I do.			8	entry right below that?		
	9	Q	-- from Swartz IP Services Group to Integrated			9	A I don't know.		
13:19:11	10		Administration on March 6th?		13:20:50	10	Q Okay. It reflects \$145 payment. You don't		
	11	A	I do.			11	know what that's for?		
	12	Q	Okay. So that's also reflected on this			12	A No, I don't.		
	13		cover --			13	Q Okay. Now, in the middle of the page, we see		
	14	A	This is the one we've talked about already.			14	the arrow toward the right, from Integrated		
13:19:18	15	Yes.			13:20:59	15	Administration, which reflects a \$149,000 payment to Kia		
	16	Q	Okay. Take a look, please, at the last page of			16	Jam Productions.		
	17		this exhibit.			17	Do you see that?		
	18	A	No problem.			18	A Uh-huh. Yes, I do.		
	19	Q	And this last page also reflects what we saw on			19	Q And if you keep going toward the right, you see		
13:19:30	20		the first page, a \$300,000 payment from Swartz IP to		13:21:08	20	that \$149,000 was then paid to you.		
	21		Integrated Administration --			21	Do you see that?		
	22	A	Okay.			22	A Yes. For American Express.		
	23	Q	-- do you see that?			23	Q And that's the American Express black card that		
	24	A	Okay. Yeah.			24	we've been referring today?		
13:19:36	25	Q	And then we see multiple arrows going from		13:21:19	25	A Yes.		

		Page 130			Page 132
13:21:20	1	Q Okay. And the next arrow from Integrated	13:23:16	1	Exhibit 17?
	2	Administration reflects a \$63,000 payment to		2	A Yes, sir.
	3	Mr. Zarrinkelk.		3	Q Okay. And then the second payment on this page
	4	Do you see that?		4	is \$186,000 from Swartz IP to Malibu Escrow Corp.
13:21:31	5	A Yes.	13:23:22	5	Do you see that?
	6	Q Do you know what that's a reference to?		6	A I do.
	7	A It's says "Wire to Carol Watson."		7	Q Do you know what that payment was for?
	8	Q Okay. So --		8	A No. It had nothing to do with the Swartz IP
	9	A We looked at that earlier.		9	bank account. I have no idea what that was for.
13:21:39	10	Q That's the \$63,000 that was --	13:23:34	10	Q Do you know what Malibu Escrow Corp. is?
	11	A Yeah. He sent an e-mail instructing us to		11	A I'm assuming it's an escrow corporation in
	12	send -- he said I'm sending in \$300,000. Send \$63,000		12	Malibu, but that's just based on the name. I don't
	13	to Carol auction thing.		13	know, though.
	14	Q Okay. So that's one of the payments for which		14	Q Do you know if Mr. Bergstein was purchasing
13:21:52	15	Mr. Zarrinkelk was serving as the facilitator?	13:23:45	15	property in Malibu at this time?
	16	A That is correct.		16	A I don't know what David was doing.
	17	Q Okay. Now the last entry toward the bottom		17	Q Let's turn to the last page of this exhibit,
	18	reflects a \$25,000 payment to National Financial		18	please.
	19	Services.		19	Now this last page also reflects what we saw in
13:22:03	20	Do you see that?	13:24:07	20	the first page, and that's a \$50,000 payment from Swartz
	21	A I do.		21	IP Services Group to Integrated on March 13, 2012.
	22	Q What's National Financial Services?		22	A Okay.
	23	A I don't know.		23	Q Do you see that?
	24	Q Do you have any idea why a \$25,000 payment		24	A I do.
13:22:10	25	would have been made from your company to National	13:24:15	25	Q And let's look at the arrow toward the right.
		Page 131			Page 133
13:22:13	1	Financial Services at this time?	13:24:20	1	It reflects a \$30,000 payment to K.Jam Media?
	2	A I'm sure I did it at David's instructions.		2	A Yes, sir.
	3	Q Let's look at Exhibit 17.		3	Q Okay. And then to the right of that you see
	4	(Exhibit 17 was marked for		4	that list of various payments?
13:22:32	5	identification by the Court Reporter	13:24:32	5	A Yes, sir.
	6	and is attached hereto.)		6	Q What's Stanton & Associates?
	7	BY MR. LATZER:		7	A I think one of the insurances, I couldn't
	8	Q Now, Exhibit 17 is another government exhibit		8	afford to pay it all at once, and I financed it. I
	9	introduced at Mr. Bergstein's criminal trial. It's		9	think this was a payment on that. It's somehow tied to
13:22:42	10	Exhibit 54.	13:24:46	10	one of the insurance policies.
	11	A Okay.		11	Q What insurance are you referring to?
	12	Q And you see on the first page two payments, one		12	A There was a bunch of insurances. I don't know
	13	from Swartz IP Services Group for \$50,000 to Integrated		13	specifically which this was, but EPLI, employer, blah,
	14	Administration.		14	blah, one of those insurances. It could have been that.
13:22:56	15	Do you see that?	13:25:03	15	I don't know what it was, but one of the insurance
	16	A Yes.		16	policies. I don't remember.
	17	Q Okay. Now, if you look again at Exhibit 40,		17	Q That's insurance for Integrated?
	18	page 36 --		18	A I don't remember specifically.
	19	A Okay.		19	Q Okay. Now there's an entry right below that to
13:23:05	20	Q -- on March 13, 2012 you see --	13:25:13	20	AT&T, and I believe you testified before that you --
	21	A I see it.		21	AT&T was your provider for your home?
	22	Q -- there was a payment of \$50,000 from		22	A AT&T is my current provider for my cell phone.
	23	Integrated Administration?		23	AT&T back then was either the provider for the office,
	24	A I do.		24	Internet office phone something. I don't remember
13:23:13	25	Q Okay. And that's also reflected on plaintiff's	13:25:36	25	specifically what, one those things.

Page 134				Page 136			
13:25:41	1	Q	Do you recall whether -- when AT&T became your cell phone provider?	13:27:36	1	A	I believe so, yeah.
	2				2	Q	You've got three different providers?
	3	A	I think, if I remember correctly, when I got an iPhone, which was -- I was late to the iPhone thing, a couple years ago I switched from an Android to iPhone, and I think that's when it became my carrier, I think.		3	A	I -- I don't know they were multiple providers.
13:25:53	5				4		Maybe one of them was a provider of something for the house. I don't know. I don't remember.
	6				6	Q	And by "house," you're referring to your personal house?
	7	Q	Okay. Now --		7	A	Yes. My -- my residence. But I have DirecTV at the house, so it wouldn't haven't been -- Time Warner wouldn't have been for my house. I've had DirecTV for a very long time at home. I still do. So I don't know what Time Warner was for. It was for -- maybe the long distance carrier was different. I didn't really deal with this. Steve Piscula did.
	8	A	Two years ago maybe. A year and a half ago.		8		
	9	Q	-- before I believe you testified that Verizon was providing phone services for the office.		9		
13:26:10	10	A	Yeah. The phone and Internet, I think, were different at the office. One of them was one, and one was the other, I think. I don't remember which was which.	13:27:54	10		
	11	Q	So your testimony is that you providing -- or paying AT&T and Verizon for phone and/or Internet services at this time?		11		
	12	A	That is my recollection of it, yes. I could be wrong, but that's what I think it is.		12		
13:26:18	15	Q	Okay. And below AT&T there's a payment to Mr. Poormand.		13		
	16				14		
	17				15	Q	Uh-huh.
	18				16	A	Maybe the long distance carrier was different than the regular phone provider. I don't know.
	19				17		
13:26:29	20	Q	Now this document also reflects that there was a \$30,000 payment from Integrated to Kia Jam Media; right?		18	Q	
	21				19		
	22	A	Okay.		20		
	23	Q	And then it appears to show an arrow going back to Integrated Administration, which reflects a payment of \$7,000 to Integrated Administration from Kia Jam Media.		21		
13:26:36	25	A	Yes.	13:28:08	25		
Page 135				Page 137			
13:26:36	1	Q	Okay. And you were paying him \$300?	13:28:37	1		Do you see that?
	2	A	Yes.		2	A	I do.
	3	Q	Okay. Do you recall why you were paying your uncle \$300 at this point?		3	Q	Do you have understanding why Kia Jam Media was paying back \$7,000 to Integrated Administration?
13:26:42	5	A	He was a runner. I've been trying to help him. He's been a runner at the office on and off, so he got paid for -- whether it was miles he was driving, or, I don't know what this is -- maybe he even bought something, but he was a runner for the office.	13:28:43	5	A	I don't. Don't recall.
	6				6	Q	Were there times when K.Jam Media paid money to Integrated Administration?
	7				7		
	8				8	A	There were times where K.Jam Media would cover the shortfall for Integrated Administration.
	9				9		
13:26:54	10	Q	What do you mean by "a runner"?	13:28:55	10	Absolutely. It was 10 days later, so maybe Integrated	
	11	A	Go pick -- just drive, or go pick this up, deliver this, drive here. Get groceries. Whatever. Pick up office supplies. That type of stuff.		11	Administration was short money and K.Jam floated it	
	12				12	money.	
	13				13	Q	Let's take a look at 18.
	14				14		(Exhibit 18 was marked for identification by the Court Reporter
13:27:08	15	Q	Okay. And there's a charge here for Time Warner for \$400.	13:29:38	15	and is attached hereto.)	
	16				16		
	17	A	Do you see that?		17	BY MR. LATZER:	
	18				18	Q	And Exhibit 18 is another exhibit introduced by
	19				19		the government at Mr. Bergstein's criminal trial,
13:27:16	20	A	I don't remember. I don't know. Time Warner could have been, you know, again, either the phone, or Internet, or one those things. I don't know.		20	specifically Exhibit No. 95.	
	21				21		
	22	Q	So your recollection is that AT&T, Verizon, and perhaps Time Warner, were all providing cable or -- I'm sorry, Internet or phone services to your company at that time?		22	And the title of this exhibit on the top left	
	23				23	is "Select TT Recipient Entities."	
	24				24	Do you see that?	
13:27:36	25	A	Yes.		25	Q	And the first entity listed on this document is

				Page 138					Page 140
13:30:09	1	Integrated Administration.			13:32:36	1	Q	And those services included --	
	2	Do you see that?				2	A	So when I said 250 earlier, I was clearly	
	3	A	I do.			3	wrong.	So --	
	4	Q	And it reflects that Integrated Administration			4	Q	Okay. And those services included following	
13:30:17	5	received \$2,529,732.			13:32:54	5	Mr. Bergstein's instruction to wire money to various		
	6	Do you see that?				6	entities and individuals?		
	7	A	That's what it says.			7	A	Yes.	
	8	Q	Okay. Do you know if Integrated Administration			8	Q	What other services did you provide?	
	9	received from Swartz IP \$2,529 and 7 -- \$2,529,000 --				9	A	I was out trying to do things, look at deals,	
13:30:35	10	I'm having a tough time here.			13:33:07	10	looking at deals, evaluating deals, trying to do		
	11	A	2,529,732.			11	consultant for Broadway 4D, trying get movies made,		
	12	Q	That's right. Do you know if Integrated			12	which I did, and generated revenue, and worked on		
	13	Administration received those monies from Swartz IP?				13	Sovrin. You know, whatever needed to be done.		
	14	A	I don't.			14	Q	Okay. I'm just trying to understand, of those	
13:30:50	15	Q	Okay. Do you have any reason to believe that			15	services that you just described, what does that have to		
	16	Integrated Administration did not receive that amount				16	do with Integrated Administration's payroll services		
	17	from Swartz IP?				17	you've described?		
	18	A	Yesterday the documents that your colleague			18	A	Integrated Administration was the company that	
	19	showed me was, like, a little over a million dollars.				19	did the payroll, as I've said. So my payroll, for work		
13:31:00	20	There was probably more, but I don't know the amount, so			13:33:39	20	I was doing, was apparently these checks, and they came		
	21	I don't know if this amount is correct or not correct.				21	to me because of the work I was doing.		
	22	Q	Let's take a look at Exhibit 19.			22	Q	Right. But I'm just trying to understand the	
	23	(Exhibit 19 was marked for				23	relationship of the work that you said that you were		
	24	identification by the Court Reporter				24	doing to Integrated Administration's business functions.		
13:31:28	25	and a copy is attached hereto.)			13:33:54	25	What specifically did those services have to do		
				Page 139					Page 141
13:31:28	1	BY MR. LATZER:			13:33:59	1	with payroll?		
	2	Q	And Exhibit 19 is another exhibit from			2	A	I'm sorry. I don't understand your question.	
	3	Mr. Bergstein's criminal trial, Exhibit No. 84.				3	Q	So integrated Administration, as you've	
	4	A	Okay.			4	described it, at least in part, is a payroll company?		
13:31:38	5	Q	And the title of this document is "Periodic			5	A	Yes.	
	6	Payments to Kiarash, K.Jam, for Integrated -- from				6	Q	So what payroll related services are you	
	7	Integrated Administration for August 17, 2011 to May 18,				7	performing for Integrated Administration --		
	8	2012."				8	A	Operating Integrated --	
	9	Do you see that?				9	Q	Just let me finish.	
13:31:52	10	A	Yes.			10	A	Sorry.	
	11	Q	And have you seen this document before?			11	Q	What payroll related services are you	
	12	A	No, sir.			12	performing for Integrated Administration that would		
	13	Q	Okay. So this reflects that from August 17,			13	entitle you to receive these monies?		
	14	2011 to May 18, 2012, you received total of \$167,753				14	A	My agreement was that apparently, I think it	
13:32:07	15	from Integrated Administration?				15	was 200, not 250, like I said, was my salary, and part		
	16	A	That's what it says.			16	of what David was funding was money coming into IA, and		
	17	Q	Okay. Do you believe that you did, in fact,			17	when there was money I would take a check. When there		
	18	received \$167,753 during this time period?				18	wasn't money, I wouldn't take a check.		
	19	A	It sounds about right. I don't know. But			19	Q	I don't think that answers the question,	
13:32:23	20	sure.				20	though.		
	21	Q	Okay. And why did you receive these monies?			21	What services, other than following		
	22	A	This was my paycheck.			22	Mr. Bergstein's instructions to transfer monies around,		
	23	Q	This was a paycheck that you received for			23	what services, what payroll related services were you		
	24	services that you were performing for Integrated?				24	performing for Integrated Administration that this time?		
13:32:35	25	A	Yes.			25	A	I'll give you an example. I was consulting for	

Page 142				Page 144			
13:34:53	1	Broadway 4D, I think, on or around this time, and was		13:36:58	1	A Ed DeFrank and Robert Silverman, and one other	
	2	bringing in money that would go towards making these			2	guy, the CEO's name whom I can't remember right now.	
	3	payroll checks. I was getting paid on a monthly basis			3	Q Okay. And what experience did you have at that	
	4	for consulting there.			4	time with medical billing --	
13:35:02	5	I think this was right around the time I went		13:37:13	5	A None.	
	6	out of the country to make a movie. That generated a			6	Q -- if any? You had none?	
	7	free -- a fee that I brought in to help all these. So I			7	A None whatsoever.	
	8	did everything and anything that needed to be done.			8	Q Okay.	
	9	Q Were you providing payroll related consulting			9	A I had nothing to do the operation of Sovrin. I	
13:35:13	10	services to Broadway 4D?		13:37:20	10	did not have anything to do with the operation of the	
	11	A No. Just consulting services. I don't			11	medical billing company.	
	12	understand what you mean "payroll related services."			12	Q So you just established the entity?	
	13	Q Well, Integrated Administration was a payroll			13	A Established the entity, and we provided the	
	14	company?			14	employees and paid the employees that were working	
13:35:21	15	A That's one of the things it did. It provided		13:37:28	15	there. And paid for the rent, and the office, and the	
	16	overhead services, and payroll and employees, yes.			16	Internet, and blah, blah.	
	17	Q So what did your work for Broadway 4D have to			17	Q So were you an officer of Sovrin how?	
	18	do with a payroll company?			18	A I believe so.	
	19	A My work for Broadway 4D generated money that			19	Q Do you recall your position?	
13:35:33	20	came into the companies, including AI, to pay these		13:37:38	20	A I don't.	
	21	payments.			21	Q Okay. Do you know who, if any -- were there	
	22	Q To pay these payments to yourself?			22	any other officers of Sovrin?	
	23	A Payments to everybody. As I said, if there			23	A I don't remember the corporate structure of	
	24	wasn't money for me to take it, I wouldn't take it. I			24	Sovrin.	
13:35:46	25	made sure everybody else got paid first.		13:37:47	25	Q Okay. Did you have an ownership interest in	
Page 143				Page 145			
13:35:59	1	Q Now, you've made a number of references today		13:37:50	1	Sovrin?	
	2	to Sovrin; is that correct?			2	A I believe as the -- as the officer, I think I	
	3	A Yes, I have.			3	did. I don't remember, though. I don't remember the	
	4	Q Okay. And what is Sovrin?			4	corporate structure, as I said.	
13:36:09	5	A Sovrin was a company set up to get into the		13:37:57	5	Q Okay. Do you know if it was a corporation?	
	6	medical billing industry.			6	A I think it was corporation, not an LLC, I	
	7	Q Okay. And when was it set up?			7	think. But I'm not certain.	
	8	A I don't remember the date. Somewhere around			8	Q And do you recall whether you established it	
	9	that time.			9	the same way you establish Kia Jam Media?	
13:36:23	10	Q That was a company that you and Mr. Bergstein		13:38:07	10	A I don't.	
	11	set up?			11	Q Or the same way that you established Integrated	
	12	A I set up.			12	Administration?	
	13	Q You set it up?			13	A I don't recall how I established it.	
	14	A I believe so, yes.			14	Q Okay. And approximately when was it	
13:36:29	15	Q Okay. Did Mr. Bergstein have any involvement		13:38:16	15	established?	
	16	with Sovrin?			16	A In 2010, '11, '12. In that arena. I don't	
	17	A Yes. He's the one who got the business. It			17	remember specifically.	
	18	was his idea. He and, I think, the Weston guys who came			18	Q Right around the same time that you established	
	19	up with plan to do this business, and it was a good			19	Integrated Administration?	
13:36:42	20	opportunity.		13:38:27	20	A No. After. I think after. Shortly after.	
	21	Q So was this a business that you, Mr. Bergstein,			21	Q Shortly after?	
	22	and the Weston guys were running together?			22	A I think so.	
	23	A No, we were not running it. It was being run			23	Q Okay.	
	24	by two other gentlemen who were experts in the field.			24	A I'm not certain, but --	
13:36:56	25	Q And who were those gentlemen?		13:38:36	25	Q And where was Sovrin providing medical billing	

Page 146				Page 148			
13:38:39	1	services?		13:40:43	1	So I think there was one or two occasions where	
	2	A Their office was in Glendale.			2	Sovrin did, in fact, pay some of that loan back to IA.	
	3	Q Okay. And did you testify -- I believe you			3	Q Okay. So your position is that Integrated	
	4	testified before that you were providing consulting			4	Administration, at least at some point, loaned money to	
13:38:53	5	services to Sovrin?		13:40:55	5	Sovrin?	
	6	A No.			6	A Was advancing loans. Was advancing monies to	
	7	Q You never provided any consulting services to			7	Sovrin for Sovrin, yes. And at some point, when they	
	8	Sovrin?			8	started generating a little bit, it wasn't that much	
	9	A No. I just -- you know, we -- IA was providing			9	money. I think was, you know, 10, \$20,000. I don't	
13:39:01	10	the employees. If I said that, that's incorrect.		13:41:08	10	think it was much more than that. I don't remember.	
	11	Q So was IA leasing employees to Sovrin Health?			11	And then they would keep some of that money for their	
	12	A You're colleague asked me that yesterday. I			12	ongoing operations, and they wrote a check to, I think	
	13	don't what what "leasing employee" means. I don't know			13	it was IA, on one or two occasions. I don't remember	
	14	what that means. We -- they're employees that worked			14	specifically. Or they wrote it to some other company.	
13:39:12	15	there. Their paychecks came from IA, so IA was		13:41:23	15	I don't remember.	
	16	advancing all the expenses for the employees.			16	Q Okay. So by advancing money, do you mean	
	17	Q Okay. And did Integrated Administration have			17	loaning money, or is that something different?	
	18	any sort of written agreement with Sovrin Health			18	A That's advancing money. You know, you need to	
	19	regarding their arrangement with -- arrangement with			19	advance for the lease. You know, you got to pay for --	
13:39:27	20	these employees?		13:41:32	20	so you're advancing for expenses hoping that you get	
	21	A I don't remember. I don't remember. They had			21	back paid back.	
	22	employee -- I think they employment agreements. I don't			22	Q So it was effectively a loan arrangement?	
	23	remember. They probably had employment agreements,			23	A I don't know what you want to call the	
	24	yeah, I would imagine.			24	arrangement. I'm telling you what it was. It was	
13:39:42	25	Q Have you ever seen any of these employment		13:41:44	25	advancing expenses hoping that you get your money back.	
Page 147				Page 149			
13:39:44	1	agreements?		13:41:47	1	Q Okay. Were there -- was there a written	
	2	A I don't remember. I think if they were there,			2	agreement reflecting that advancing arrangement?	
	3	that's something Steve Piscula would have done because			3	A I don't remember. I don't think so. I don't	
	4	they need to have probably paperwork in order to get			4	know.	
13:39:52	5	health insurance, and Steve and Frymi's office would		13:41:53	5	Q Do you know if any collateral was provided in	
	6	handle those -- those level of details at the office.			6	connection with that advancing arrangement?	
	7	Q Okay. And is Sovrin still in operation today?			7	A There's no collateral that I know of.	
	8	A No. As I said yesterday, it's not.			8	Q Did Sovrin have any relation to Swartz IP?	
	9	Q What did it stop operating?			9	A Sovrin was its own entity. Sovrin was its own	
13:40:06	10	A Sometime after that. I don't remember the		13:42:14	10	entity. I don't --	
	11	date.			11	Q Did Sovrin ever provide services to Swartz IP?	
	12	Q Did it stop operating around the time when, as			12	A Sovrin services was medical billing to the	
	13	you described yesterday, things went south?			13	extent that maybe Swartz IP had an agreement to fund it,	
	14	A I don't remember when it stopped operating.			14	I don't know what Swartz IP was doing. David -- you	
13:40:17	15	Q Was it approximately sometime in 2013?		13:42:26	15	should ask David that. David Bergstein was the one who	
	16	A I don't remember when it stopped operating.			16	was dealing with that.	
	17	Q Okay. Have you ever received money from			17	Q Did Mr. Bergstein have any involvement with the	
	18	Sovrin?			18	operation of Sovrin?	
	19	A Sovrin, at one point towards the end, yeah, I			19	A No. Not that I know of. Sovrin was run by	
13:40:28	20	think there on one or two occasions where they had		13:42:49	20	those two guys and one other guy, Larry Twirsky,	
	21	collected on some of the -- on the medical, on the -- I			21	something like that, I think, was the other guy. Larry	
	22	think it was -- whatever type of medical thing they were			22	something. Larry-something. Yeah.	
	23	doing they collected some money. And at some point some			23	Q So you believe that the two individuals who	
	24	of the money that we had advanced to them was getting			24	were running Sovrin Health were Ed Defrank and Larry	
13:40:42	25	paid back to, I believe it was to IA.		13:43:02	25	Twirsky?	

		Page 150		Page 152	
13:43:02	1	A Robert Silverman, and -- and I think Larry was	13:44:59	1	Mr. Defrank or Mr. Silverman?
	2	brought in. I don't remember when or how, but Robert		2	A I don't know. I don't know.
	3	Silverman and Ed Defrank were the two principals.		3	Q Okay. So Mr. Bergstein came to you and
	4	Q Robert Silverman and Ed Defrank?		4	expressed an interest in getting involved in the medical
13:43:15	5	A Yes, sir.	13:45:13	5	billing industry; is that correct?
	6	Q Okay. Who's Larry Twirsky?		6	A He came to me and said, "Set up a company."
	7	A He was brought in, I think, or was going to		7	We're getting in the medical billing space." Something
	8	come in as a consultant, or brought in somehow. He was		8	to that effect.
13:43:22	9	another expert in the field that did some work for		9	Q And so you established this -- and entity
	10	Sovrin. I don't remember the details.	13:45:23	10	called Sovrin Health System?
	11	Q Okay. What -- what's prompting you to describe		11	A I established an entity called Sovrin. And I t
	12	these individuals as expert in the field?		12	think it's -- I don't remember the official name, but it
	13	A If I remember correctly, they'd been in that		13	sounds right, Sovrin Health Systems.
13:43:34	14	field for 20-some-odd years each, that's what I		14	Q Is -- I understand that that entity's not
	15	remember.	13:45:33	15	operating anymore, but is it still in existence?
	16	Q And how did you learn that?		16	A I don't know. I think it is.
	17	A They -- I don't remember who introduced them to		17	Q Have you taken any steps to dissolve that
	18	the party. I think David ultimately hired them both.		18	entity?
	19	Found them, interviewed them and hired them. But I		19	A I don't remember if I have or not.
13:43:45	20	don't remember who -- I don't know who introduced them	13:45:43	20	(Exhibit 20 was marked for
	21	to the operation. I don't know that.		21	identification by the Court Reporter
	22	Q And what prompted Mr. Bergstein to get into the		22	and is attached hereto.)
	23	medical billing industry?		23	BY MR. LATZER:
	24	A I don't know. As he described it to me, it		24	Q Let's look at Exhibit 20.
13:43:58	25	was -- it was a really interesting space. So it was a	13:46:18	25	A Okay.
		Page 151		Page 153	
13:44:01	1	space that with the right funding behind it could be	13:46:25	1	Q If you want to flip through that document, let
	2	very lucrative. You're buying, you know, medical bills		2	me know when you've had a chance to do so.
	3	that don't get paid for a long time, and you're buying		3	A Okay. Okay.
	4	them at a discount. And then when you collect, there's		4	Q Okay. Can you tell me what these are?
13:44:11	5	a lot of money to be made. Somehow somebody talked him	13:46:36	5	A These are Integrated Administration invoices to
	6	into it. I think it was maybe the Weston guys that		6	Sovrin.
	7	talked him into it.		7	Q Okay. And are these documents that you've
	8	Q Okay. So you and Mr. Bergstein had a		8	produced in discovery in case?
	9	discussion about getting involved in this industry?		9	A I don't know. Are these documents we produced
13:44:21	10	A No. David told me we're getting involved in	13:46:52	10	in discovery?
	11	this business. I did not have a discussion about		11	Q Oh, if you don't know you don't know?
	12	getting involved in medical billing.		12	A Does this stamp mean we did?
	13	Q Did you object to getting involved?		13	Q It is -- it's the IA Bates stamp. But in any
	14	A No.		14	even, let me ask you some questions.
13:44:31	15	Q You thought it was a good idea?	13:47:11	15	Have you ever been in possession of these
	16	A The way he described it to me I thought it was		16	invoices before?
	17	a good idea. I thought it was a good opportunity, he		17	A I don't know.
	18	had said these Weston guys have a lot of money behind		18	Q Have you ever seen these before?
	19	him, and that's what we need to make this really		19	A I think I might have seen one or two of them.
13:44:40	20	successful. And I thought great.	13:47:20	20	I don't know. As I said, Steve Piscula and Frymi did a
	21	Q And when you're referring to "this" really		21	lot of this kind of, you know, behind back office stuff
	22	successful, what are you -- what is "this"?		22	for the company. So I don't know if they did it. I did
	23	A The medical billing practice, Sovrin.		23	not create these, I don't think. I don't remember.
	24	Q Okay. And did Mr. Bergstein have a		24	Q Okay. But as you sit here today, you don't
13:44:55	25	relationship with the individuals you identified before,	13:47:36	25	recall if you've seen these?

Page 154			Page 156		
13:47:38	1	A I don't recall if I've seen them, but I think I	13:49:41	1	correct?
	2	might have. I think I might have seen these, actually.		2	A That's what this is, yes.
	3	Yes, I vaguely have a recollection that I've seen these.		3	Q Okay. Now, if you look underneath the section
	4	Q Okay. Do you know how these sorts of invoices		4	that's entitled "Description."
13:47:51	5	would be accessed?	13:49:48	5	A Huh-uh.
	6	A As I said, I think Steve and Frymi in the		6	Q The first line states, "Monthly fix consulting
	7	office did a lot of this kind of paperwork. So maybe		7	fees."
	8	they -- they created them. And if they e-mailed them to		8	Do you see that?
	9	me, I don't really remember.		9	A I do.
13:48:08	10	Q Do you know if they were kept electronically?	13:49:54	10	Q And in parenthesis it says "(per agreement)."
	11	A I do not. I do not know.		11	Do you see that?
	12	Q Do you know if there as a file with hard copies		12	A I do.
	13	of these sorts of invoices?		13	Q And there's a reference here to the right to
	14	A I do not know. I do not know. Sorry to		14	\$20,000.
13:48:22	15	interrupt you.	13:50:01	15	Do you see that?
	16	Q So let's look at the first invoice. It's dated		16	A I do.
	17	March 31st, 2012.		17	Q Okay. What's your understanding of why this
	18	Do you see that on the top right?		18	states monthly fixed consulting fees?
	19	A I do. Or maybe Harry. Harry might have		19	A This is Sovrin, um, getting billed 20,000 a
13:48:35	20	created these. I don't know who did, but --	13:50:13	20	month for the services of the people that are listed on
	21	Q Who's Harry?		21	this invoice.
	22	A Harry Simonian. We talked about him yesterday.		22	Q Okay. This reflects that Integrated
	23	He's an accountant at the office.		23	Administration was providing consulting to Sovrin
	24	Q And when you say "the office," are you		24	Health; is that right?
13:48:44	25	referring to the officer that you shared with	13:50:24	25	A That's what this says.
Page 155			Page 157		
13:48:45	1	Mr. Bergstein?	13:50:25	1	Q Okay. What consulting was Integrated providing
	2	A Yes. He was an accountant in the office on		2	Sovrin?
	3	Colorado.		3	A I don't know what the agreement it refers to.
13:48:54	4	Q Okay. Now, if you look at top right-hand		4	Maybe David was consulting on kind of the direction of
	5	corner of this invoice, there's a reference to	13:50:36	5	the company because the whole thing was his idea. Don
	6	inter-company charges.		6	Carol was doing IT for the office, Jeff was doing legal
	7	Do you see that?		7	work, Steve Piscula was in the office, and Frymi was
	8	A Yes.		8	handling, you know, David's desk. So that's what those
	9	Q Do you know what that means?		9	people are.
13:49:03	10	A No.	13:50:50	10	Q Okay. But then you're also identified here.
	11	Q Okay. And if you look at the bill to section		11	A Am I identified as well? Yes.
	12	so the left --		12	Q What were you doing for Sovrin Health?
	13	A Uh-huh.		13	A As I told you, and we've been through this a
	14	Q -- do you see that? It says "Sovrin Health		14	bunch, I was the guy at Integrated Administration. I
13:49:17	15	System" --	13:51:00	15	was the one signing the paychecks. I was out trying to
	16	A Uh-huh.		16	raise money so there was money in Integrated
	17	Q -- and then there's and address identified?		17	Administration to pay for bills as they needed to be
	18	A Yes.		18	paid.
	19	Q And the address is the same address at which		19	Q But what specifically were you doing for Sovrin
13:49:24	20	you and Mr. Bergstein shared an office; is that correct?	13:51:11	20	Health?
	21	A That's correct. That's where all the bills		21	A I was doing whatever needed to be done. If
	22	would go.		22	Sovrin needed insurance, I was the one to go get the
	23	Q So Integrated Administration is sending a bill		23	insurance. If Sovrin needed health insurance for the
	24	from its Colorado Boulevard office to Sovrin Health		24	employees, I was the one who would go get the health
13:49:38	25	System at the same Colorado Boulevard office; is that	13:51:21	25	insurance for the employees. I was the one who went and

		Page 158		Page 160
13:51:23	1	negotiated the lease on their office. I was the one who	13:53:12	things that I know about.
	2	did whatever needed to be done so that they can have a	2	Q Okay. But you also know about Swartz IP?
	3	running operation.	3	A I do.
	4	Q Your testimony is that you negotiated the lease	4	Q But your testimony is that wasn't one of the
13:51:32	5	on Sovrin's office?	5	ways in which he raised money?
	6	A I believe -- I think I did negotiate the lease	6	A He certainly did raise money for Swartz IP,
	7	on Sovrin's office.	7	yes.
	8	Q What office are you referring to?	8	Q And that was the money that came that Class TT?
	9	A They had an office in Glendale, as I've	9	A Yes. Class TT did, in fact, put money into
13:51:40	10	mentioned already.	10	Swartz IP. We've established that.
	11	Q And that was different from the office that's	11	Q And there's a reference here next to where it
	12	listed on this "bill to" section?	12	says "Monthly fix consulting fees," it says in
	13	A Yes. The "bill to," this is just where the	13	parenthesis, "(per agreement)."
	14	paperwork and the corporate would go. There was an	14	Do you see that?
13:51:50	15	office in Glendale where dozens of people went to work	15	A I do.
	16	every day for Sovrin.	16	Q Do you know what agreement that's referring to?
	17	Q Your testimony is that dozens of people worked	17	A I do not.
	18	for Sovrin?	18	Q And you're not aware of any written agreement
	19	A Yeah. Whoever worked for Sovrin, I don't know	19	for services provided between Sovrin and Integrated
13:52:01	20	how many people, went to work at this office in Glendale	20	Administration?
	21	every day.	21	A If there was an agreement, I don't remember it.
	22	Q And does this invoice reflect that those	22	Q Do you know if this invoice was paid by
	23	individuals, including yourself, were providing	23	Integrated Administration?
	24	consulting to Integrated Administration?	24	A I don't know.
13:52:14	25	A I didn't create this, so I don't -- I -- I	25	Q Okay. If you look the bottom right, you see a
		Page 159		Page 161
13:52:16	1	don't know what people, whoever wrote this, was	13:54:04	reference to a total due from previous invoice.
	2	thinking, but --	2	Do you see that?
	3	Q So you have no idea what this is for?	3	A I do.
	4	A I'm telling you that the work that we did, I	4	Q Okay. Are you aware of a previous invoice from
13:52:24	5	don't think is considered consulting, but I don't know.	5	before March 12th -- March 31st, 2012?
	6	Maybe -- maybe David, as I said, was consulting with	6	A I don't recall.
	7	Robert Silverman and Ed Defrank and those guys. They	7	Q Let's turn to the second page. It's the one at
	8	were the guys who were running the company. Maybe he	8	Bates No. 757.
	9	was consulting with them on what they should be doing,	9	A Okay.
13:52:34	10	what they shouldn't be doing, the direction, how to	10	Q And this reflects what purports to be another
	11	raise the money they needed, whatever it was. I don't	11	invoice from Integrated to Sovrin?
	12	know what David was doing.	12	A I see. It seems like it's the same thing with
	13	Q But did Mr. Bergstein have any experience in	13	a different date.
	14	the medical billing industry as you knew?	14	Q And you're not able to identify any consulting
13:52:44	15	A Not that I knew of, but he certainly had a lot	15	services that were actually provided at this time by
	16	of experience in raising money.	16	Integrated Administration for Sovrin Health; is that
	17	Q Sort of along the way that he raised money	17	right?
	18	through Swartz IP? Is that what you're referring to?	18	A As I mentioned to you, if Jeff Kransenberg
	19	A No. That's not what I'm referring to.	19	(sic), Kransberg (sic) -- Kranzdorf or David Bergstein
13:52:56	20	Q What are you referring to?	20	were doing consulting for the guys who were running
	21	A I'm referring of the Miramax transaction.	21	Sovrin, I'm not aware of it. I don't what they were
	22	Q Any other transactions?	22	doing.
	23	A Yeah, he bought a film library that I know of.	23	Q Well, let's focus on Mr. Kranzdorf. Are you
	24	He raised money for movies, he raised money from another	24	aware of any medical billing experience that
13:53:09	25	fund a while ago for again more movies. Those are the	25	Mr. Kranzdorf had at this time?

		Page 162			Page 164
13:55:14	1	A No. But he's an attorney. Maybe he was, you	13:57:17	1	Q By "companies," you're referring to the
	2	know, helping them draft contracts. I don't know what		2	companies that you and Mr. Bergstein had?
	3	he was doing at the time.		3	A I refer to Integrated Administration company.
	4	Q And, in fact, he is an attorney who was		4	Q You said "companies."
13:55:20	5	subsequently disbarred; right?	13:57:24	5	A And then she substantially went on to do some
	6	A He was disbarred in California, as I said		6	more work for Jeff while Jeff was no longer on the IA
	7	yesterday, yes, but he currently has a license to		7	payroll.
	8	practice law in New York.		8	Q Okay. Why was Mr. Kranzdorf on the IA payroll?
	9	Q Okay. Was he still a member of the bar in		9	A He was an employee of the company. He was a
13:55:32	10	California as of April 30th, 2012?	13:57:37	10	lawyer. He did a bunch of work for David. He wrote up
	11	A I don't know.		11	dozens and dozens of contracts, and documents, and did
	12	Q So your testimony is that Mr. Bergstein or		12	whatever David needed him to do.
	13	Mr. Kranzdorf may have been providing consulting		13	Q Okay. Did he do any payroll-related work?
	14	services to Sovrin at this time?		14	A I don't know what you mean. You've asked that
13:55:58	15	A What I'm telling you is, I don't know what they	13:57:52	15	a bunch of times. I don't understand what "payroll
	16	were doing. If David, who hired those guys, who found		16	related work" is. Did he write checks? No.
	17	them, whose idea it was to start that business was doing		17	Q Well, you described IA as a payroll company.
	18	some consulting work for them, I am unaware of it and I		18	A IA was a company that provided overhead
	19	don't know.		19	services and had employees for various entities. He was
13:56:07	20	Q Well, you're certain that you didn't provide	13:58:03	20	one of those employees who was an attorney who worked
	21	any consulting services for Sovrin at this time?		21	for David, who worked on a multitude of transition --
	22	A I don't -- I'm trying to think of specifically		22	transactions for David, and his compensation came from
	23	what I did. Consulting them on helping them do their		23	IA.
	24	lease, maybe that's considered consulting. I don't	13:58:15	24	I would guess that he had a -- he drafted
13:56:21	25	know. Consulting on what insurance package their		25	contracts, he drafted employment agreements, he drafted
		Page 163			Page 165
13:56:23	1	employees should have, I don't know. I was doing	13:58:19	1	whatever legal documents that the folks at Sovrin might
	2	whatever I needed to do to provide those employees a		2	or might not have needed, he might have done that for
	3	paycheck and a place to go and work. If that's		3	them.
13:56:34	5	Q And this invoice makes another reference to an		4	Q So he worked on a multitude of transactions,
	6	agreement.	13:58:28	5	none of which had to do with Integrated Administration's
	7	Do you see that?		6	business?
	8	A I do.		7	A No. Integrated Administration business was
	9	Q And you're not aware of any written agreement		8	whatever we could do to generate money. David was
13:56:40	10	between Sovrin and Integrated such that -- or pursuant		9	working on a number of deals that were supposed to
	11	to which Integrated would provide consulting services to		10	generate money, and Jeff worked on all of those. Or not
	12	Sovrin?		11	all of those, maybe -- a lot of those with David. And
	13	A I -- I've already answered that question. If		12	the goal of all of those would be to generate -- to
	14	there is one, I don't remember it.		13	create successful businesses, or generate funding that
13:56:52	15	Q Okay. And that's really true for any services		14	could come into IA to pay for everything.
	16	that Integrated might have provided to Sovrin. You're	13:58:42	10	Q Was Integrated Administration, as far as you
	17	not aware of any written agreement?		11	were concerned, just a vehicle through which you could
	18	A I can't think of one. If there was one, I		12	transfer monies from person to person, or from company
	19	don't remember it.		13	to company?
13:57:04	20	Q There's a reference on here to Sandra		14	A No, sir.
	21	Carpenter. Do you know who that is?	13:59:04	20	Q No?
	22	A Sandra Carpenter is a legal assistant. She's,		21	A No.
	23	like, a paralegal who worked on and off for the		22	Q Your testimony was that it was actually a
	24	companies. She's been working with Jeff for a long		23	viable operating business?
13:57:17	25	time.		24	A It was. Yes.
			13:59:17	25	Q Let's look the next invoice, 758.

Page 166				Page 168			
13:59:19	1	A Okay.		14:01:26	1	reference to "service charges."	
	2	Q And this is an invoice dated May 31st, 2012.			2	Do you see that?	
	3	A Okay.			3	A I do.	
	4	Q And do you see that?			4	Q The word "service" is misspelled, but you see	
13:59:31	5	A I do.		14:01:32	5	what I'm referring to?	
	6	Q Okay. And there's a reference again to			6	A I do. "Servsi."	
	7	inter-company charges. What does that refer to?			7	Q Do you know what that means, "service charges"?	
	8	A As I said earlier, I don't know.			8	A No.	
	9	Q You don't know.			9	Q Okay. And this reflects -- strike that.	
13:59:41	10	And again, we see a reference under the		14:01:47	10	This invoice reflects a request from Integrated	
	11	description "To Monthly fixed consulting fees," and then			11	Administration that Sovrin pay a \$20,000 for reported	
	12	in parenthetical it says, "(per agreement)."			12	consulting work; is that correct?	
	13	Do you see that?			13	A Just like all the other ones, yes. That's what	
	14	A I do.			14	it says.	
13:59:53	15	Q Okay. So this is another \$20,000 invoice,		14:02:06	15	Q And if you look at the bottom right, you see at	
	16	ostensibly for consulting fees that Integrated			16	this point there's a total unpaid balance of	
	17	Administration is sending Sovrin Health; is that			17	\$154,583.33.	
	18	correct?			18	Do you see that?	
	19	A That's what it reads like.			19	A I do.	
14:00:05	20	Q Okay. And we see on the bottom right, there's		14:02:16	20	Q And you're not sure whether that was paid?	
	21	an indication of a total unpaid of \$81,038.33.			21	A I'm not sure whether it was paid. I doubt --	
	22	Do you see that?			22	Sovrin never had this kind of money to pay it.	
	23	A I do.			23	Q Okay. Let's look at the next one, 761. This	
	24	Q Do you know if that was paid?			24	is dated October 31st, 2012. And do you see in the top	
14:00:19	25	A I don't.		14:02:36	25	right there's another reference to inter-company	
Page 167				Page 169			
14:00:20	1	Q Do you know if, at any point in time,		14:02:38	1	charges?	
	2	Integrated Administration paid any of these invoices?			2	A I do.	
	3	A You mean Sovrin.			3	Q Do you see that? And I take it you don't know	
	4	Q I'm sorry. Yeah.			4	what that refers to?	
14:00:29	5	Do you know if, at any point in time, Sovrin		14:02:42	5	A No.	
	6	paid any monies to Integrated Administration pursuant to			6	Q Okay. And so this is an invoice which reflects	
	7	these invoices?			7	a request by Sovrin to Integrated Administration for	
	8	A As -- as I told you on -- on one or two			8	\$20,000 for purported consulting services; is that	
	9	occasions Sovrin did write small checks to, I don't			9	right?	
14:00:42	10	remember if it was IA or what entity. I do not know.		14:02:57	10	A That's what it looks like.	
	11	But I don't -- Sovrin never really became the big time			11	Q Okay. 762, please.	
	12	company we were hoping it to become, so I don't think			12	A Okay.	
	13	these ever got paid. But I do not know.			13	Q And this is a November 30th, 2012 invoice from	
	14	Q You and Mr. Bergstein were hoping it would			14	Integrated Administration to Sovrin; right?	
14:00:54	15	become a big giant company?		14:03:11	15	A Yes.	
	16	A Not just us. Everybody involved, I'm sure it			16	Q And again, we see in the top right	
	17	was.			17	inter-company charges?	
	18	Q And if you could turn to page 760?			18	A Yes.	
	19	A Yes, sir.			19	Q And you don't know what that's a reference to?	
14:01:12	20	Q This is a -- an invoice dated September 30,		14:03:19	20	A No.	
	21	2012 from Integrated Administration to Sovrin; is that			21	Q Okay. And this, again, is a invoice from	
	22	correct?			22	Integrated to Sovrin requesting payment of \$20,000 for	
	23	A Yes, it is.			23	purported consulting work; is that correct?	
	24	Q Okay. Now, if we look the top right-hand			24	A Yes.	
14:01:23	25	corner of this invoice, is it says "for," and there's a		14:03:35	25	Q Okay. 763, please.	

Page 170			Page 172		
14:03:40	1	A Okay.	14:26:44	1	THE VIDEOGRAPHER: We're back on the record at
	2	Q This is a December 31st, 2012 invoice from		2	2:25 p.m.
	3	Integrated Administration to Sovrin; is that correct?		3	BY MR. LATZER:
	4	A Yes.		4	Q Mr. Jam, I'm showing you what I'm marking as
14:03:52	5	Q Okay. And again, this -- there's a reference	14:27:12	5	Exhibit 21.
	6	in the top right to inter-company charges.		6	A Thank you.
	7	Do you see that?		7	(Exhibit 21 was marked for
	8	A Yes.		8	identification by the Court Reporter
	9	Q And you're not sure what that refers to?		9	and is attached hereto.)
14:04:01	10	A Still don't.	14:27:17	10	BY MR. LATZER:
	11	Q Okay. And this is an invoice from Integrated		11	Q Just let me know when you've had a chance to
	12	Administration requesting payment to Sovrin of \$20,000		12	look through that document.
	13	for purported consulting work; is that correct?		13	A I have.
	14	A Yes.		14	Q Okay. Do you know what this is?
14:04:18	15	Q And 759. If you could turn to the next page,	14:27:34	15	A I created this document.
	16	please? I understand that the pages are out of order,		16	Q You created this document?
	17	but the --		17	A I believe so. The front page I did.
	18	A No, I got it.		18	Q Only the front page?
	19	Q -- invoice by dates go in order.		19	A I'm looking at the other pages now. I think I
14:04:28	20	This is a June 30th, 2013 invoice from	14:27:48	20	created the whole thing.
	21	Integrated Administration to Sovrin; is that correct?		21	Q Okay. You believe you --
	22	A Yes.		22	A I don't know what --
	23	Q And this, again, refers in the top right-hand		23	Q -- typed up each page of this document?
	24	corner to service, for which is misspelled --		24	A Except for the last two pages. I don't
14:04:47	25	A Spelled again.	14:28:02	25	remember the last two pages. But we looked at these
Page 171			Page 173		
14:04:47	1	Q -- charges. Do you see that?	14:28:05	1	last two pages already elsewhere. But the Excel part,
	2	A Yes.		2	the first few pages, I'm pretty sure I created this
	3	Q And, as before, you don't know what that's		3	document.
	4	referring to?		4	Q Okay. When did you create it?
14:04:53	5	A No.	14:28:16	5	A Years ago.
	6	Q Okay. And this is an invoice from Integrated		6	Q Around this 2011, 2012 text time period?
	7	Administration to Sovrin requesting \$20,000 in payment		7	A No, no, no. No. No. Way after that.
	8	for purported consulting work; is that correct?		8	Q Way after that?
	9	A Yes.		9	A Yeah.
14:05:09	10	Q Now, if we look at the total unpaid amount on	14:28:26	10	Q After things had gone south?
	11	this invoice, it states \$101,000. I'm sorry,		11	A Yeah, this -- I created this probably three
	12	\$101,083.33; is that correct?		12	years ago, two, three, something like that. Three, four
	13	A Yes.		13	years ago. Somewhere in that neighborhood.
	14	Q Okay. Now, if we look back at the previous one		14	Q And was that after Sovrin had stopped
14:05:27	15	on 763, it reflected a total unpaid amount of	14:28:41	15	operating?
	16	\$214,583.33; is that correct?		16	A I think so.
	17	A Yes.		17	Q Okay. Fair to say that it was sometime
	18	Q Do you have an understanding as to why that		18	after -- or strike that.
	19	amount decreased from December 31st, 2012 to June 30th,		19	Fair to say it was sometime in 2015 or after?
14:05:44	20	2013?	14:28:52	20	A I'm -- I'm not sure, but it sounds right. I
	21	A No, I don't.		21	don't remember.
	22	MR. LATZER: All right. Let's take a break.		22	Q And what prompted you to create this document
	23	THE VIDEOGRAPHER: We are going off the record.		23	then?
	24	The time is 2:03 p.m.		24	A I think it was a conversation I had with David.
14:05:51	25	(A recess was taken.)	14:29:01	25	David was talking about one the lawsuits. It could have

Page 174			Page 176			
14:29:03	1	been this one. That whoever had said to him, or one of the points that was made is that Sovrin is a company, never existed, and that was an argument somebody was making. I don't know if it was this, or his criminal trial or whatever. I don't remember specifically. And	14:31:04	1	A Yes.	
	2	I said, "Let me put together a list of everything that was spent on Sovrin, and all the employees. And I think what I did is I had all the canceled checks to go along with it as well at some point.		2	Q Okay. And that identifies three different years; 2012, 2013 and 2014.	
14:29:16	5			3		
	6			4	A Correct.	
	7		14:31:10	5	Q Do you see that?	
	8			6	A I do.	
	9			7	Q Okay. And do those amounts relate to?	
14:29:26	10	Q So in order to show that Sovrin was actually at one time an operating entity, you needed to put together this document; is that right?		8	A I would imagine those are the amounts of payroll for that year of direct Sovrin employees. The	
	11		14:31:23	10	addition of allocation is below. It says, "20 percent of the salaries for the following employees, David	
	12			11	Bergstein, Kia, Jeff, Don, Frymi, Steve Piscula," and	
	13			12	some money in accounting. Because obviously we weren't	
	14			13	doing full-time Sovrin. So the additional allocation of	
14:29:44	15	A No, I didn't need to do it for that reason. I did this to show how much Sovrin had cost. How much money had gone into Sovrin.		14:31:40	15	204,000 and 134,000 is 20 percent of the salaries of
	16	Q For purposes of showing that it was an operating entity?		16	those people I had mention, allocated to Sovrin, for a total \$1.442 million over three years spent Sovrin.	
	17			17	Q All right. Well, let's focus on 2012.	
	18	A I believe so.		18	A Okay.	
	19	Q Okay. So you put together this document at Mr. Bergstein's request?	14:32:01	20	Q Your position is that Sovrin had a payroll of	
14:29:55	20			21	629,915 -- \$629,915.16?	
	21	A I don't -- I don't remember if it was his request or if I offered to do it. I don't remember.		22	A Yeah. That's on the next page, 1753, the breakdown.	
	22	Q Did you actually type this out yourself?		23	Q And where did that number come from?	
	23			24	A On page 1753.	
	24	A I believe I did 'cause I had to do all the calculations.		25		
Page 175			Page 177			
14:30:05	1	Q And do you have a copy of this document in electronic form?	14:32:19	1	Q Okay. So we see on 1753, these are the gross wages, as you identified them, for various -- are these various employees of Sovrin?	
	2			2		
	3	A I don't know. Maybe. Yeah.		3		
	4	Q Was it created using Excel?		4	A Yes. These were the dedicated Sovrin employees.	
14:30:15	5	A It was.		5	Q And were they actually employees of Sovrin?	
	6	Q Okay. Do you know if you still have access to the Excel file?		6	A They worked for Sovrin. They were employees of -- Integrated Administration was offering the payroll services as you know.	
	7		14:32:46	10	Q Okay. And so how did you go about determining each of these individual's gross wages such that they're reflected on this document?	
	8	A I don't know. Maybe.		11		
	9	Q Okay. Would that be saved on a computer of yours?		12		
14:30:27	10			13	A I probably asked either Majid or Frymi to tell me what it was, because they were the ones who had --	
	11	A Didn't we produce this to you?		14	Frymi kept copies of everybody's paychecks and stuff like that. Or I asked Majid. I don't remember what I did.	
	12	Q This document was produced in PDF format.		15	Q And did you have any assistance with inputting this information?	
	13	A Yeah. I don't know. I can look for it if we need to. Digitally.	14:33:02	15	A I asked for the raw information, then I'm pretty sure I created this document myself.	
14:30:40	14	Q Do you believe that you used Excel to make this document?		16	Q You put it in yourself?	
	15			17	A Yes.	
	16	A I do.		18	Q Okay. So again, focusing on 2012, on the first page of this document, there's a reference to additional	
	17	Q Okay. So the first page is entitled "Summary."		19		
	18	A I don't know if there was another page that went on top of this or not. I think I would have written "Sovrin" or something on here, so maybe this was the work in progress. I don't know which one this is.	14:33:17	20		
14:30:50	19	Q Okay. And there's a reference toward the top left, it says, "Sovrin Payroll."		21		
	20	Do you see that?		22		
	21		14:33:30	23		
	22			24		
	23			25		
	24					
14:31:02	25					

			Page 178				Page 180
14:33:34	1	allocation.		14:35:57	1	Q And that's true for all these people who were	
	2	Do you see that?			2	receiving salaries from Integrated Administration?	
	3	A Yeah. I talked about already.			3	A Yes. The way I calculated these numbers, is I	
	4	Q And so 20 percent of the \$629,915.16 number, is			4	took 20 percent of their salaries for the year.	
14:33:47	5	204 -- \$212,000.31; is that correct?		14:36:16	5	Q Let me just ask that a little clearer.	
	6	A No, it's not correct.			6	All of the individuals referenced under this	
	7	Q Okay. Can you explain the relationship between			7	additional allocation reference were receiving salaries	
	8	the first \$629,000 number and the \$204,000 number?			8	from Integrated Administration; is that correct?	
	9	A The \$629,000 has nothing to do with the 204.			9	A Yes.	
14:33:58	10	The 629 is the addition of all the dedicated employees		14:36:29	10	Q Okay. And there's a reference here to 20K in	
	11	of Sovrin, what they got paid. The \$204,000 is a			11	accounting, and that was money that was going toward --	
	12	20 percent allocation of the salaries that were paid to			12	A And I just had a flat \$20,000 for annual	
	13	the people who were not working full-time at Sovrin.			13	accounting. I just made that a flat number.	
	14	David, myself, Kranzdorf, Don Carroll, Frymi, Steve			14	Q And so Mr. Zarrinkelk received \$20,000 for	
14:34:21	15	Piscula, and an allocation of \$20,000 for accounting,		14:36:42	15	accounting work that he performed for Sovrin?	
	16	because Majid was doing the accounting. That's what			16	A No, that's not correct. I'm allocating \$20,000	
	17	adds up to \$204,000 for 2012.			17	from the fees that were paid him to Sovrin accounting.	
	18	For 2013, it's \$134,000. In 2014, there really			18	Q Okay. What are you basing that allocation on?	
	19	wasn't much so I didn't even do it. 2014, there was			19	A I don't remember at the time. I think I just	
14:34:37	20	actual 15,354.50 in payroll. 2013, according to this		14:37:02	20	went with 20 percent. And this was not an official	
	21	document, was 458,625.94 in payroll. So total payroll			21	document. This was just a document I did to see roughly	
	22	of the dedicated Sovrin employees, and the additional			22	how much money had been spent on Sovrin?	
	23	allocation, is \$1,442.3.			23	Q What do you mean by "it's not an official	
	24	Q Okay. So this reflects that you, and			24	document"?	
14:34:58	25	Mr. Bergstein and others, were receiving a salary from		14:37:12	25	A This wasn't done at -- you know, I wasn't --	
			Page 179				Page 181
14:35:01	1	Sovrin Health?		14:37:16	1	you know, 20 percent is just a number I picked out of	
	2	A No, it doesn't.			2	the sky. I just created this document myself to see how	
	3	Q Okay. It says, "Additional allocation is			3	much money had been spent on Sovrin salaries.	
	4	comprised of 20 percent of the salaries for the			4	Q Can you just clarify why this refers to 20K in	
14:35:07	5	following employees."		14:37:32	5	accounting services?	
	6	A Right. Right. I'm allocating 20 percent of			6	A Yes. Majid's firm was paid more than \$20,000	
	7	the salaries for work being done for Sovrin, because not			7	for the year, because he did accounting for a number of	
	8	all of salary could be applied to Sovrin, 'cause that's			8	the entities, as you know. I allocated 20,000 of the	
	9	not all I was doing. So I've allocated 20 percent of			9	money that he was paid to Sovrin expenses. So he was	
14:35:23	10	the salaries of the people that I mentioned, who would		14:37:45	10	not paid by Sovrin. I just allocated \$20,000 of his	
	11	part-time basically work on Sovrin, and that's what			11	services for Sovrin.	
	12	those numbers add up to.			12	Q Was there any basis for that \$20,000 number?	
	13	Q Okay. So is it your testimony that you were			13	A No. I just pulled the number out of thin air.	
	14	spending approximately 20 percent of your work -- strike			14	Q And you did the same thing for the 20 percent	
14:35:37	15	that.		14:38:00	15	number?	
	16	Is it your testimony that you were devoting			16	A Yes.	
	17	approximately 20 percent of your work towards Sovrin?			17	Q Now, there's a reference on this first page to	
	18	A No. My testimony is that 20 percent of my			18	transfers from SIP, Deutsche Bank account to IA Wells	
	19	salary was allocated to Sovrin. I don't remember			19	Fargo account.	
14:35:47	20	specifically how much of my time I was spending on		14:38:12	20	Do you see that?	
	21	Sovrin.			21	A Yes.	
	22	Q And 20 percent your salary from who?			22	Q And then below that, transfers from SIP Wells	
	23	A The salary that I was making.			23	Fargo account to IA Wells Fargo account.	
	24	Q From?			24	Do you see that?	
14:35:55	25	A From Integrated Administration.		14:38:19	25	A Yes. Yes.	

				Page 182					Page 184
14:38:19	1	Q	Okay. So let's look at the first set. It says		14:40:47	1	Q	And if you go down towards the bottom, there's	
	2		total number of transfers 15.			2		a reference to you and Mr. Bergstein.	
	3		Do you see that?			3		Do you see that?	
	4	A	Yes.			4	A	I do.	
14:38:25	5	Q	And total amount of transfers, 2,015,000.		14:40:57	5	Q	And that reflects gross wages of \$493,846.54.	
	6		Do you see that?			6		Do you see that?	
	7	A	I do.			7	A	I do.	
	8	Q	So what prompted you to include information			8	Q	Okay. And then this is referring to 2012, this	
	9		about transfers from Swartz IP to -- well, strike that.			9		page; is that correct?	
14:38:42	10		Why did you reference these transfers from SIP		14:41:23	10	A	Yes, I believe so. Yes, it is.	
	11		Deutsche Bank account to the Integrated Administration			11	Q	And toward the right, there's a 20 percent	
	12		Wells Fargo account?			12		notation.	
	13	A	Probably David's request.			13		Do you see that?	
	14	Q	And do you have an understanding as to what			14	A	Yes, I do.	
14:38:55	15		these transfers have to do with this summary that you're		14:41:34	15	Q	Now, what were you trying to do, show here?	
	16		providing?			16	A	Exactly what I already said. I've taken the	
	17	A	No.			17		salaries of these people, I've taken 20 percent of it,	
	18	Q	Do you have an understanding of what these			18		and I've come up with the item that goes in the	
	19		transfers have to do with Sovrin?			19		additional allocation category, which is on the first	
14:39:08	20	A	No. I think David probably told me find out		14:41:49	20		page.	
	21		how much money had come in from SIP to the two accounts,			21	Q	Okay. So this reflects the fact that you and	
	22		which I did, and then I did the above calculation to see			22	Mr. Bergstein together, for 2012, received a salary of		
	23		how much had gone out to Sovrin employees for payroll.			23	\$493,846.54; is that correct?		
	24	Q	Okay. But as you sit here today, you have no			24	A	That's what it says.	
14:39:21	25		understanding as to any relationship between SIP and		14:42:05	25	Q	And 20 percent of that salary was being	
				Page 183					Page 185
14:39:27	1	Q	Sovrin?		14:42:07	1		allocated to Sovrin Health; is that correct?	
	2	A	I don't -- as I sit here now, I don't know if			2	A	That's correct.	
	3		the money from -- I don't remember. Maybe the money			3	Q	This \$493,846.54 number, where does that	
	4		from SIP came in for the purpose of Sovrin. I don't			4		come from?	
14:39:35	5	A	remember.		14:42:19	5	A	The gross sal -- the gross salaries that went	
	6	Q	Okay. Are there any documents that could			6		out to he and I for the year. It was a combination of	
	7		refresh your recollection in that regard?			7		the two.	
	8	A	Not I know of.			8	Q	Did you refer to any documents?	
	9	Q	Okay. So from -- what information were you			9	A	I'm sure I did.	
14:39:52	10		able to -- well, strike that.		14:42:28	10	Q	Did you get that information from	
	11		Did you refer to any documents in order to			11	Mr. Zarrinkelk?		
	12		reference these transfers from SIP's bank accounts?			12	A	Probably. Either from him, or from Frymi, or	
	13	A	I think I asked -- probably asked Majid for a			13		from Steve or somebody.	
	14		list of deposits in. Maybe that's how I did it. I			14	Q	And why did you combine those salaries for you	
14:40:12	15		don't remember. Probably did that. I probably asked			14:42:36	15	and Mr. Bergstein?	
	16	A	Majid for the general ledger.			16	A	I don't know. I could have combined all of	
	17	Q	Okay. So you would agree with me, based on			17		them online. It doesn't really matter. I was just	
	18		this document, that Integrated Administration received			18		trying to get to that \$204,000 number.	
	19		from Swartz IP at least \$2,295,000; is that correct?			19	Q	But you see that Mr. Kranzdorf is listed alone	
14:40:32	20	A	That's what this document says. Yes.			20		for -- for his salary?	
	21	Q	Okay. Do you have any reason to doubt that			21	A	Yes. Maybe those guys can be, you know, carved	
	22		that's not accurate?			22		out into legal department, administrative support and	
	23	A	No. No.			23		accounting services, where David and I were more	
	24	Q	Okay. Let's look the second page here.			24		administrative. I don't know.	
14:40:43	25	A	Okay.		14:43:02	25	Q	And you'll see next to the numbers for --	

Page 186			Page 188		
14:43:07	1	A Right.	14:44:26	1	lawsuit?
	2	Q -- the number for Mr. Kranzdorf, it says "legal		2	A No. He asked me to prepare it. I don't know
	3	support."		3	why he needed it, and I think I needed it, too, just to
	4	Is that right?		4	see how much had gone off to Sovrin. And I'm sure once
14:43:12	5	A Yes.	14:44:35	5	I did this, I sent it to him with all the backup. And
	6	Q And for Don C., Frymi and Steve, it says "IT		6	he -- I don't know what he did with it, if it was
	7	administrative support"?		7	helpful to him or not. I don't know.
	8	A Yes.		8	Q But you just told me that he asked you to do it
	9	Q And underneath that is Mr. Zarrinkelk's firm.		9	in connection with a lawsuit; is that not correct?
14:43:21	10	Do you see that?	14:44:44	10	A I think -- no, I think when he -- when we
	11	A Yes, I do.		11	talked, it was either a lawsuit or something. Somehow
	12	Q And there's a reference to accounting services?		12	someone had said that there was a claim that Sovrin was
	13	A Yes.		13	not a real company. I don't specifically what it was,
	14	Q Okay. The entry next to the information for		14	or who had said that to him, and said, "That's bullshit.
14:43:29	15	you and Mr. Bergstein is blank; right?	14:44:56	15	I have all these employees. Put something together to
	16	A Uh-huh.		16	show how much was spent on the employees," and that's
	17	Q So what services were you and Mr. Bergstein		17	what I did.
	18	providing Sovrin Health?		18	Q And you said --
	19	A You've already asked that question a number of		19	A Pardon my -- pardon my language. I apologize.
14:43:42	20	times. We've already been through that. I told you	14:45:03	20	Q -- and you said that when you created this
	21	what I was doing and, you know, I've told you I don't		21	document you also needed it?
	22	know what David was doing in terms of dealing with those		22	A Yeah. I wanted to know how much had been
	23	guys. I've already answered that question.		23	spent. If somebody had said that, I wanted to know how
	24	Q Okay. Is there a reason why you left this		24	much was spent, so we had this document. In case
14:43:50	25	blank?	14:45:14	25	somebody mentioned, it I could say, here, we spent
Page 187			Page 189		
14:43:50	1	A It was an internal document. No, I didn't --	14:45:14	1	\$1.4 million on salaries over three years.
	2	no, I don't think it was a big deal.		2	Q Okay. And let's look at the next page. It's
	3	Q Is that because --		3	the one that's Bates numbered 1754.
	4	A It could have said admin there. I don't know.		4	A Got it.
14:43:56	5	Q Is that because you didn't know what you and	14:45:31	5	Q And I believe that this refers to information
	6	Mr. Bergstein had done for Sovrin Health?		6	for 2013; is that correct?
	7	A No.		7	A I believe so. Yes.
	8	Q All right. Right --		8	Q Okay. And there's a reference here to gross
	9	A I didn't feel like I needed to put anything		9	wages for you, Mr. Kranzdorf, Mr. Carroll, Ms. Biedak
14:44:03	10	there.	14:45:54	10	and Mr. Piscula; is that correct?
	11	Q Okay. But it's true that you didn't know what		11	A Yes.
	12	Mr. Bergstein had done for Sovrin Health?		12	Q Okay. And I notice that Mr. Bergstein is not
	13	A I don't know what --		13	listed here.
	14	MR. MIGLER: Asked and answered.		14	A Right.
14:44:07	15	BY MR. LATZER:	14:46:06	15	Q Had Mr. Bergstein stopped performing services
	16	Q Go ahead.		16	for Sovrin at this -- by this time?
	17	A Short of what I've already said a number of		17	A I don't know what he was doing, but he wasn't
	18	times, he's the one who came up with the idea, he's the		18	listed on here because he didn't take any paychecks that
	19	one who found the two guys to run it. I don't know what		19	year.
14:44:15	20	else he was doing on a day-to-day basis with those guys.	14:46:17	20	Q He didn't take any compensation from Sovrin
	21	Q And you've described this as an internal		21	that year?
	22	document; is that right?		22	A It wasn't from Sovrin. It was from Integrated
	23	A Yes.		23	Administration.
	24	Q But isn't it true that Mr. Bergstein asked you		24	Q Okay. He didn't take any compensation from
14:44:23	25	to prepare this for purposes of defending himself in a	14:46:25	25	Integrated Administration for that year?

		Page 190		Page 192	
14:46:27	1	A That's what I would assume, based not this.	14:48:17	1	that question.
	2	Q Okay. And how -- how were you able to compile		2	Q Okay. And I know I told you this after we
	3	this information?		3	started after lunch that some of my questions may seem
	4	A I -- I already answered. I either got the		4	repetitive.
14:46:37	5	information from Frymi or Steve, or from Majid.	14:48:24	5	A Yeah.
	6	Q Just as you did for the previous year?		6	Q But they're -- I'm asking --
	7	A Yes. I did the same thing for all three -- for		7	A They're exactly repetitive. That's why it's
	8	all three years.		8	getting frustrating.
	9	Q Okay. So this reflects that in 2013, you		9	Q -- I'm asking them because I need to ask them.
14:46:50	10	received a general salary from Integrated Administration	14:48:27	10	So if you could just do me a favor and answer with
	11	for \$24,230.79; is that correct?		11	respect --
	12	A Correct.		12	A So it's the same thing as I told you.
	13	Q And you were allocating 20 percent of that to		13	Q -- just let me talk --
	14	Sovrin?		14	A Sorry.
14:47:04	15	A Yes.	14:48:33	15	Q -- and then you can talk.
	16	Q And that 20 percent number was just a number		16	A I apologize.
	17	that you pulled out of thin air?		17	Q With respect to 2013, what services do you
	18	A It's exactly as I already answered. It's the		18	claim you provided for Sovrin Health?
	19	same thing for all three years.		19	A The same thing I offered for previous years.
14:47:14	20	Q Okay. Now we see that Mr. Kranzdorf received	14:48:42	20	Just operational. Doing whatever I could say to bring
	21	\$200,000.06 for 2013 from Integrated Administration?		21	in cash to pay the \$458,000, or whatever portion of what
	22	A Yes. That's all from Integrated		22	I could. Their office, whatever they needed, their
	23	Administration --		23	lease, their insurances, health insurance. Whatever
	24	Q Okay.		24	needed to be done.
14:47:25	25	A -- so that's the case.	14:48:56	25	Q Okay. And the last page of this document,
		Page 191		Page 193	
14:47:28	1	Q And again, 20 percent was allocated towards	14:48:58	1	Bates numbered 1755 --
	2	Sovrin?		2	A Yes.
	3	A Yes. It sounded like a fair number.		3	Q -- this is the information for 2014; is that
	4	Q Now, once again, we see here that for		4	correct?
14:47:41	5	Mr. Kranzdorf, there's a description of the services he	14:49:07	5	A I believe so. Yes.
	6	was providing as legal support; is that correct?		6	Q So 2014 is the year that the company stopped
	7	A That's what it says.		7	operating?
	8	Q And for Mr. Carroll, Ms. Biedak and		8	A That is correct.
	9	Mr. Piscula, it says they were providing IT and		9	Q Okay. And you didn't perform any services for
14:47:50	10	administrative services; is that correct?	14:49:16	10	the company that year?
	11	A That's correct.		11	A I think the number was so minuscule, it didn't
	12	Q And for Mr. Zarrinkelk's firm we see accounting		12	matter anymore.
	13	service; is that correct?		13	Q Okay. And the only employees you claim who
	14	A Yes, it is.		14	perform services for Sovrin during this 2014 time period
14:47:58	15	Q Okay. But next to your name it's blank; is	14:49:29	15	were Mr. Millano and Ms. Potensiano?
	16	that correct?		16	A I believe so. Yes.
	17	A That's correct.		17	Q Okay. Now, after Mr. Bergstein asked you to
	18	Q Okay. Is that because you didn't know what		18	compile this document, did you send it to him?
	19	services you provided for Sovrin Health that year?		19	A I believe I sent this to him, yes. I think so.
14:48:06	20	A No, sir. That's not correct.	14:49:47	20	Q Did you have a discussion with him about it?
	21	Q Okay. Well, what services did you provide for		21	A I don't really recall.
	22	Sovrin that year?		22	Q Okay. Do you know what he did with it?
	23	A I've answered that question a number of times.		23	A I don't know what David did with it. No.
	24	Q Well, can you please answer it for 2013, then?		24	Q Did you -- do you recall whether you made any
14:48:14	25	A It's the same as every other time I've answered	14:50:00	25	changes to the document after you first sent it to him?

		Page 194			Page 196
14:50:04	1	A I don't recall. I remember going back to it.	14:52:13	1	A Yes. We've talked about him. Allan Lee was a
	2	I don't have a recollection of doing that.		2	financial consultant. As I mentioned before lunch
	3	Q It's your recollection that you drafted this		3	today, he had been working on and off with David for
	4	document --		4	many years. He does financial modeling and PowerPoint
14:50:12	5	A It was a preposterous allegation that Sovrin	14:52:25	5	presentations, and books and decks for transit -- for --
	6	wasn't a company and didn't have employees.		6	for potential deals and current deals, or -- you know.
	7	Q Just let me finish the question.		7	Q Do you did know what Quant Media Advisors. Inc.
	8	A Oh. Sorry.		8	is?
	9	Q It's your recollection that you drafted this		9	A No. Was that his company?
14:50:20	10	document on one instance and never after that point made	14:52:38	10	Q I'm asking you.
	11	a change to it?		11	A I don't know.
	12	A I think so.		12	Q And who's Mr. Ron Tutor?
	13	Q Okay.		13	A Ron Tutor is David's former partner. He's a --
	14	A If I made a change, it's 'cause maybe there was		14	a successful gentleman. He lives, you know, here. He's
14:50:27	15	an inaccuracy. I don't remember.	14:52:55	15	a construction magnate and he also has many other
	16	Q Okay. Do you know if Mr. Bergstein filed this		16	interests. One was in the media and entertainment for a
	17	document in connection with a lawsuit?		17	number of years. I -- I don't know what he's doing now
	18	A I have no idea what David Bergstein did with		18	besides his construction business.
	19	it.		19	Q Do you have a relationship with Mr. Tutor?
14:50:37	20	Q Okay. But, as you recall, there were no	14:53:10	20	A We have known one another for a long time. I
	21	further discussions with him about it?		21	haven't spoken to him in years.
	22	A I don't recall one.		22	Q Have you ever done business with him?
	23	Q Have you had any discussions with anyone else		23	A I worked for him when I worked at Miramax. He
	24	regarding this document?		24	was one of the owners of Miramax. And when I worked for
14:50:44	25	A I have.	14:53:18	25	Capital Films, he was one of the owners of Capital
		Page 195			Page 197
14:50:45	1	Q Who's that?	14:53:24	1	Films.
	2	A My lawyers.		2	Q Okay. Do you know if Integrated Administration
	3	Q Oh, okay. You don't need to tell me about		3	provided services to Mr. Tutor?
	4	that.		4	A Yes.
14:51:06	5	Sir, do you know who John Zhi Wang is?	14:53:29	5	Q What services?
	6	A Not off the top of my head. No.		6	A There was some scanning of documents and, you
	7	Q Do you know what Illuminer Inc, is?		7	know, some legal work for some of his library stuff. He
	8	A Yeah. It was one of the companies that David		8	and David owned libraries together and -- and, you know,
	9	was working with. I think the Weston guys might have		9	some of the guys on the IA payroll worked for them on
14:51:25	10	been involved. Something to do with lightbulb	14:53:43	10	and off over the years.
	11	technology, I think. I don't know much more beyond		11	Q Okay. Did Integrated Administration provide
	12	that.		12	any payroll related services to Mr. Tutor?
	13	Q Do you know if Integrated Administration		13	A Provided employees that were on payroll to work
	14	provided any services for Illuminer Inc.?		14	for him.
14:51:39	15	A I believe so. I think Jeff probably did some	14:53:57	15	Q Okay. All right. Let me show you Exhibit 22.
	16	legal work. I know David did a bunch of work on it.		16	(Exhibit 22 was marked for
	17	I'm sure Frymi and Steve did some work.		17	identification by the Court Reporter
	18	Q So Mr. Kranzdorf was working as an attorney on		18	and is attached hereto.)
	19	Integrated Administration's payroll?		19	BY MR. LATZER:
14:51:58	20	A Jeff was working. He was -- sometimes as an	14:54:15	20	A Thank you.
	21	attorney, he would draft paperwork. He would draft		21	Q I'll give you a minute to flip through that
	22	documents and deal memos and whatnot for David and for		22	document.
	23	whatever was needed. Trying to close deals and help		23	A Okay.
	24	with deals.		24	Q Okay. Can you tell me what this exhibit
14:52:13	25	Q Do you know Allan Lee, Inc. is?	14:54:29	25	consists of?

Page 198				Page 200			
14:54:30	1	A	A series of invoices.	14:56:42	1	have come in to the folded companies probably.	
	2	Q	Okay. And these are invoices that were		2	Q	Okay. Did that work have anything to do with
	3		directed to Integrated Administration?		3		Integrated Administration's payroll services?
	4	A	Yes. One of them was directed to Illuminer		4	A	He was doing legal diligence for a new company
14:54:40	5	Inc.	No, it's from Illuminer Inc. Okay. Sorry. Okay.	14:56:57	5	that we're looking to get into. It would have been	
	6	Yes.	Okay.		6	something like Sovrin. It would have been another	
	7	Q	All right. Let's look at the first one. It's		7	company that if we would have purchased it, it would	
	8		from The Barnes Law Firm, and it's date February 7,		8	have come in under, and all the employees would have	
	9		2012.		9	been integrated -- under the Integrated Administration	
14:54:58	10		Do you see that?	14:57:08	10	banner.	
	11	A	I do.		11	So this was a diligence. This was for a	
	12	Q	What's The Barnes Law Firm?		12	company we looked at, but ultimately ended up not	
	13	A	There's an attorney named Michael Barnes who		13	purchasing.	
	14		has been an attorney for many years. He was Ron Tutor		14	Q Why didn't you just have these entities like	
14:55:06	15		and David Bergstein's attorney for a number of years.	14:57:17	15	Sovrin employ these -- or employ its employees directly?	
	16	Q	Okay. Did he -- has he ever performed any		16	A I don't know. I think it's probably easier to	
	17		services for you?		17	have one company do payroll and pay payroll taxes, and	
	18	A	Yes.		18	have all the necessary insurances than to do it for five	
	19	Q	Okay. What was the nature of those services?		19	different entities. It probably makes more financial	
14:55:19	20	A	I worked on this Alliance transaction with him.	14:57:35	20	sense, I guess.	
	21		And Miramax we worked on together. He was our lawyer on		21	Q Okay. And there's reference here to legal	
	22		Miramax. He's a very successful and well-regarded		22	services, advance retainer to commence Alliance	
	23		lawyer, primary entertainment and transactional.		23	diligence.	
	24	Q	All right. So this is what appears to be an		24	Do you see that?	
14:55:36	25		invoice directed to Integrated Administration F/A/O	14:57:45	25	A I do.	
Page 199				Page 201			
14:55:41	1	Boson, LLC.		14:57:45	1	Q What's Alliance diligence?	
	2		Do you see that?		2	A Alliance was a company -- is a company in	
	3	A	Uh-huh.		3	Canada, Alliance Atlantis, which, after we closed on	
	4	Q	Okay. What's F/A/O?		4	Miramax, was a -- we were looking for other	
14:55:48	5	A	I don't know. For service of is F/S/O, so I	14:57:56	5	entertainment assets to -- to purchase. Michael was the	
	6		don't know what F/A/O is. Maybe it's a typo.		6	lawyer on the Miramax transaction, and Alliance Atlantis	
	7	Q	Okay. What's Boson, LLC?		7	we heard was for sale, so we began some extensive	
	8	A	Boson is -- is a company that David owns, or		8	diligence through a distributor, and they have a library	
	9		owned. I don't know if he does now.		9	and some rights up in Canada. And -- and I think they	
14:56:01	10	Q	And what was the nature of that company?	14:58:06	10	have a Pay TV deal up there, too. I don't remember the	
	11	A	I don't know. It's his company. I have		11	details of the diligence at this time.	
	12		nothing to do with it.		12	Q Okay. So this invoice appears to be requesting	
	13	Q	And you say it's his company and you have		13	\$165,000; is that correct?	
	14		nothing do with it, but Integrated Administration was		14	A Yes, it does.	
14:56:16	15		receiving this invoice on its behalf; is that correct?	14:58:24	15	Q Do you know if Integrated Administration paid	
	16	A	Probably because David was doing work on the		16	those monies?	
	17		Alliance diligence, and Michael Barnes was the lawyer.		17	A I don't.	
	18		He did some extensive diligence on the Alliance purchase		18	Q Okay. And so this is a request from Barnes Law	
	19		for us, and -- and that was one of the major deals we		19	Firm to Integrated Administration to pay for legal work	
14:56:31	20		were looking into and diligencing at the time.	14:58:39	20	with -- which related to this Alliance diligence as	
	21	Q	And what that have to do with Integrated		21	you've described?	
	22		Administration?		22	A Yes.	
	23	A	Integrated Administration was the, uh --		23	Q Okay. And do you know what would have prompted	
	24		probably the company that David bought and the money to		24	The Barnes Law Firm to send the invoice to Integrated	
14:56:41	25		pay these. Because if we would have done it, it would	14:58:53	25	Administration?	

Page 202				Page 204			
14:58:55	1	A	I'm sure David advised -- asked him to do that.	15:00:58	1	Q	Before sitting here today, you don't recall seeing it?
	2	Q	Do you know if Integrated Administration was providing employees Boson, LLC?		2	A	I don't remember if I have.
	3	A	I'm sure some of the employees were, you know, working on Boson. I would imagine Frymi, and Steve and David Bergstein who were three employees had stuff to do with Boson.		4	Q	Okay. Is this something that you had access to?
14:59:04	5	Q	Do you know what they were doing for Boson, LLC?		6	A	If David sent it to me to get this invoice paid I would have seen it, but I don't remember specifically.
	8	A	I do not. Supporting David, whatever that was.		7	Q	So if he had sent it to you around this time, what would you have done with it?
	11	MR. MIGLER:	Counsel, it's almost 3:00 o'clock. I don't know if you want to break for a short time?		8	A	If there was instructions to pay it, I would have paid it.
	12	MR. LATZER:	It's up to you. I probably have -- should be no more than another half hour.		9	Q	And what would you have done with the physical invoice?
14:59:16	10	THE WITNESS:	I mean, if -- can I use my phone? I'll just e-mail him and say we're 30 minutes away. Let's keep going. I'd rather just go and be done.		10	A	I would have e-mailed it to Majid saying, pay per this invoice.
	15	MR. LATZER:	That's fine.		11	Q	Okay. Was that --
	18	THE WITNESS:	Just one second, please. I apologize.		12	A	Or I wrote a check per this invoice, and I'd send him a copy of the check and a copy of this invoice.
14:59:33	20	(Call being made.)			13	Q	Did you keep invoices like this in electronic form?
	21	THE WITNESS:	Sorry, guys. I apologize.		14	A	I would e-mail them to Majid. I wouldn't keep anything.
	22	BY MR. LATZER:			15	Q	Would you keep them saved on your computer?
	24	Q	Let's turn to the second page of this exhibit --		16	A	To the extent that they were e-mailed, they would be on my computer. Once in a while I would clear
15:00:02	25			15:01:38	25		
Page 203				Page 205			
15:00:03	1	A	Okay.	15:01:41	1	out my computer or try to reduce the number of e-mails I had. But if I -- if I wrote a check on this, because there's no wire instructions, I would imagine I did, I would take a photocopy of the check, and I'd put it with this, and I would scan it and send it to Majid.	
	2	Q	-- Bates numbered 766.		2	Q	Okay. Did you have -- did you keep hard copies of invoices like this?
	3	A	Okay.		3	A	No.
	4	Q	And this purports to be an invoice from Mr. Wang.		4	Q	No?
15:00:11	5	A	Uh-huh.		5	A	I would not.
	6	Q	And it's dated February 28, 2012; is that correct?		6	Q	Did anyone at Integrated Administration?
	7	A	Yes, it is.		7	A	Majid would on behalf of the company.
15:00:17	10	Q	Okay. This invoice is directed to Integrated Administration care of Mr. David Bergstein. Do you see that?		8	Q	Okay. And the --
	11	A	Yes, I do.		9	A	Maybe Frymi would, too. I don't know. I don't know if Frymi did.
	13	Q	And the letter -- the re line of the letter is "Company Matters."		10	Q	Okay. And this letter reads, "Dear Mr. Bergstein. Attached is my invoice covering today work for IA. Thanks. Regards, John."
15:00:31	15	A	Do you see that?		11	A	Okay.
	16	Q	Okay. Do you know what that refers to?		12	Q	Did I read that correctly?
	17	A	No.		13	A	You did.
15:00:40	20	Q	Do you recall receiving this invoice from Mr. Wang in or about February 20, 2012?		14	Q	Okay. Now, there's no invoice attached to this letter.
	21	A	This says that he sent it to David via e-mail, so Mr. Wang didn't send it to me.		15	A	Not on this document.
	23	Q	Okay. Have you seen this invoice?		16	Q	Are you aware of whether an invoice was
15:00:57	25	A	I don't recall seeing it.	15:02:31	25		

Page 206			Page 208		
15:02:33	1	actually issued?	15:04:40	1	So these guys did the work, and he's billing --
	2	A I don't know.		2	we're billing Illuminer Inc. for the work that they had
	3	Q Okay. And do you know what --		3	done.
	4	A Is there a page 2 to this?		4	Q So you described Illuminer before as
15:02:39	5	Q Sir, this document was produced in discovery as	15:04:49	5	Mr. Bergstein's company?
	6	I'm presenting it to you --		6	A No. It's a company that David worked with. I
	7	A Oh, I see.		7	don't know if it was his company or not. I just heard
	8	Q -- right now.		8	the name, and I know there was something -- a deal he
	9	A I don't know. Well, it says "invoice" on it.		9	was trying to do with them, or for them, or somehow he
15:02:47	10	That's weird.	15:04:55	10	was involved with them for some sort of deal having to
	11	Q Do you know for what services Mr. Wang was		11	do, I think, with lightbulbs. I'm not sure.
	12	requesting payment?		12	Q So Integrated Administration, your company, is
	13	A No, I don't.		13	requesting payment from a company with which
	14	Q Do you know what work he had done to date for		14	Mr. Bergstein was involved; is that correct?
15:02:57	15	Integrated Administration?	15:05:13	15	A Yes. I don't know how he was involved, but he
	16	A I don't know what he was doing.		16	was the guy trying to do a deal with them and did this
	17	Q Okay. Let's turn to the next page, Bates		17	work, and we're sending them a bill per his
	18	numbered 767.		18	instructions.
	19	A Okay.		19	Q Do you know if Illuminer made this payment to
15:03:07	20	Q And this is an invoice from Integrated	15:05:24	20	Integrated Administration?
	21	Administration to Illuminer Inc.; is that correct?		21	A I don't.
	22	A Yes.		22	Q Okay. And do you recall receiving this invoice
	23	Q Okay. So this indicates that Illuminer Inc.		23	on or around January 18, 2012?
	24	had provided services for Integrated Administration at		24	A I don't.
15:03:26	25	this time?	15:05:34	25	Q Okay. Is this the first time you've seen it?
Page 207			Page 209		
15:03:28	1	A No. Integrated Administration had provided	15:05:38	1	A I don't remember.
	2	services to Illuminer Inc. Illuminer Inc. is being		2	Q Okay. Let's turn to the next page.
	3	billed \$57,000 for those services. That's why the wire		3	A Okay.
	4	instructions are to IA.		4	Q It's Bates No. 768.
15:03:39	5	Q So what services had Integrated Administration	15:05:46	5	A I see it.
	6	provided to Illuminer Inc. at this time?		6	Q And this appears to be an invoice from Allen
	7	A According to this invoice, it says "Legal		7	Inc. to Integrated Administration; is that correct?
	8	diligence, PowerPoint presentations, and creation of		8	A Yes.
	9	marketing material." It's probably Allan Lee, Jeff		9	Q And you see the line about halfway down, it
15:03:57	10	Kranzdorf and David, doing whatever they were doing.	15:06:00	10	says for "consulting services"?
	11	Q And they were doing this as part of		11	A Uh-huh.
	12	Integrated's payroll company?		12	Q And that's for the period October 27, 2011
	13	A I don't -- you keep asking that and I'm -- I'm		13	through November 3rd, 2011?
	14	not understanding when you say that. Integrated		14	A Okay.
15:04:10	15	Administration had employees that would do work for	15:06:09	15	Q Do you see that?
	16	multiple companies. One of the companies and the deals		16	A Yes.
	17	that David was trying to do was this company called		17	Q Okay. So what consulting services did Allen
	18	Illuminer. I don't know much about it. But the staff		18	Lee Inc. provide Integrated Administration?
	19	at Integrated Administration worked on that.		19	A Allen, as I had told you, was a financial
15:04:22	20	The staff would include David Bergstein, Frymi,	15:06:20	20	analyst. He worked on a lot of the deals with David.
	21	Steve did some stuff probably. I would imagine if it's		21	So whatever it was, he was doing diligence, or financial
	22	legal and diligence it's Allan Lee, it's Jeff Kranzdorf		22	projections, or modeling, PowerPoints for any and all
	23	or maybe or Jeff Solomon. PowerPoint presentations		23	the deals that David was working on.
	24	probably somebody like Allan Lee. And marketing		24	Q Okay. So these were deals that were unrelated
15:04:38	25	material would be somebody like Allan Lee as well.	15:06:33	25	to Integrated Administration?

		Page 210		Page 212
15:06:34	1	A You -- you keep saying that again, and I'm going to keep saying the same thing. I don't understand when you say that. Integrated Administration was the entity that paid people. He came in and worked on a multitude of deals, and he got pay from Integrated Administration. That's how it went down.	15:08:14	1 was part of what I was describing.
	2		2 Q Okay. Do you know if Integrated Administration	
	3		3 sent any other invoices to Mr. Tutor?	
	4		4 A I don't remember if they did.	
15:06:43	5	Q Okay. Let's turn to the next page, 769.	15:08:24	5 Q Okay. And do you recall receiving this invoice
	6	A Okay.	6 around January 28, 2013?	
	7	Q And this is, again, another invoice and Allen	7 A I don't remember the date, but I remember this.	
15:06:54	8	Lee Inc. to Integrated Administration. It's dated November 21st, 2011 --	8 Q You remember seeing this invoice before?	
	9	A Okay.	9 A I remember this transaction, I remember on	
	10	Q -- is that correct?	10 Tutor, I remember the scanning. I have a vague	
	11	A Yes.	11 recollection of this invoice and that he paid it.	
	12	Q And this reads "For consulting services October 27, 2011 to November 3rd, 2011."	12 Q You remember this project?	
	13	A Yes.	13 A Yes, I do.	
	14	Q The second half only. Do you see that?	14 Q Okay. Do you know if this invoice was paid?	
	15	A Yes.	15 A I believe it was.	
15:06:57	16	Q And this reads "For consulting services October 27, 2011 to November 3rd, 2011."	16 Q Sir, what's your current relationship with	
	17	A Yes.	17 Mr. Bergstein?	
	18	Q The second half only. Do you see that?	18 A I don't really have a relationship with	
	19	A Yes.	19 Mr. Bergstein.	
15:07:08	20	Q So what's your understanding of the consulting services that Allen Lee Inc. provided Integrated Administration at this time?	15:09:10 20 Q Do you consider him a friend?	
	21	A It's the same thing. Maybe one of the invoices was a mistake. The -- the time period seems to be the	21 A Not anymore.	
	22	same, so maybe he was supposed to bill 10,000 twice, but	22 Q And why is that?	
15:07:20	23		23 A Because he completely messed up my life.	
	24		24 Q If he called, would you talk to him?	
	25		25 A That's a good question. I don't know. I'd	
		Page 211		Page 213
15:07:25	1	he billed 20,000 the first time by mistake. I don't know. That's what I would think at this point looking at it here.	15:09:25 1 probably ask him why did you do all this shit? Pardon me. Sorry. I don't mean to say bad words.	
	2		2 Q Sir, we've seen several instances where you've	
	3		3 loaned, or claimed that you loaned money through various	
15:07:34	4	Q Okay. Now, these two invoices from Allen Lee Inc., do you recall receiving them around this time frame?	4 entities or individually to Integrated Administration; is that correct?	
	5	A Not specifically, no.	5 A Yes, sir.	
	6	Q Okay. And before sitting here today, have you seen them?	6 Q And from reviewing these bank records, isn't it true that you started to loan money to the company around the July 2012 time frame?	
15:07:41	7	A I don't remember.	7 A I don't remember when. I've done dozens and dozen of the loans, so I have no idea when it started.	
	8	Q Do you know if Integrated Administration paid these invoices?	8 Q And Mr. Zarrinkelk would loan money as well?	
	9	A I don't as I sit here.	9 A Yes. He would -- he would give us short-term	
	10	Q Okay. Let's look the last page --	10 loans.	
15:07:54	11	A Okay.	11 Q Okay. Do you know if you made any loans like that in 2011?	
	12	Q -- 770.	12 A I don't remember when I did them.	
	13	A Okay.	13 Q And earlier you referred to a warehouse that I	
	14	Q And this is an invoice from Integrated Administration to Mr. Tutor?	14 believe Integrated Administration leased?	
	15	A Yes, I see it.	15 A No. K.Jam Media was on the lease, not AI.	
15:08:04	16	Q And is this referencing the work that you were	16 Q Okay. K.Jam Media leased space --	
	17	describing before?	17 A Yes.	
	18	A Yes. Part of it, yeah.	18 Q -- for a warehouse? And did Integrated	
	19	Q Okay. Was there other work that was done?	19 Administration use that space?	
15:08:12	20	A No. I described other work as well, but this		
	21			
	22			
	23			
	24			
	25			

		Page 214		Page 216
15:10:39	1	A We had sent some employees there to scan some	15:18:57	1 tomorrow I'll have a response.
	2	things for Ron, but -- and some employees were there		2 MR. WALKER: Thank you.
	3	that would pull stuff out of the boxes as needed,		3 MR. LATZER: We can go off the record. Thank
	4	whatever.		4 you.
15:10:50	5	Q Okay. And you -- I believe you said that the	15:19:02	5 THE VIDEOGRAPHER: This concludes the
	6	warehouse was located in the Valley?		6 videotaped deposition Mr. Kia Jam. We are going off the
	7	A Yeah.		7 record at 3:17.
	8	Q Okay. Are you referring to a particular town		8 (The proceedings were concluded
	9	or city?		9 at 3:17 p.m.)
15:10:59	10	A I think it was Chatsworth.	15:19:10	10 ---oo---
	11	Q Chatsworth?		11
	12	A I'm not sure, but I believe -- I recall it		12
	13	being Chatsworth.		13
	14	Q Okay. Let's take a break.		14
15:11:08	15	THE VIDEOGRAPHER: We are going off the record		15
	16	at 3 --		16
	17	MR. WALKER: I want say something on the record		17
	18	later, but when we come back I'll do it.		18
	19	MR. LATZER: Yeah, we'll -- we'll go back on		19
15:11:14	20	the record. We'll wrap up.		20
	21	THE VIDEOGRAPHER: We're going off the record		21
	22	at 3:09 p.m.		22
	23	(A recess was taken.)		23
	24	THE VIDEOGRAPHER: Back on the record at		24
15:17:54	25	3:15 p.m.		25
		Page 215		Page 217
15:17:57	1	MR. LATZER: Mr. Jam, I don't have anything	15:19:10	1 STATE OF CALIFORNIA )
	2	further. Mr. Walker just needs to say something.		2 ) ss.
	3	MR. WALKER: Do you have any questions, Wil?		3 COUNTY OF _____ )
	4	MR. MIGLER: Depending -- I have no questions		4
15:18:04	5	for defendant at this time.	15:19:10	5 I, KIARASH JAM, say I have read the
	6	MR. WALKER: I just wanted to put on the record		6 foregoing deposition and declare under penalty of perjury
	7	that in light of the testimony over the last two days,		7 that my answers as indicated are true and correct.
	8	that -- about the American Express statements, and the		8
	9	fact that they were all provided for Mr. Majid, clearly		9
15:18:19	10	Mr. Jam has possession, custody, control over those	15:19:10	10 _____
	11	statements. I believe they are clearly responsive to		11 (Date)
	12	both Interrogatory No. 23, and request production		12 _____
	13	Nos. 36 and 40. We'd like to have those produced as		13 _____
	14	soon as possible.		14 (Signature)
15:18:33	15	THE WITNESS: Do I say something?		15
	16	MR. WALKER: And we request them going back		16
	17	seven years.		17
	18	THE WITNESS: Do I have to say something?		18
	19	MR. WALKER: I would like to get an idea from		19
15:18:48	20	your office, Wil, as to -- today or tomorrow as to	15:19:10	20
	21	where -- what your position would be on that.		21
	22	MR. MIGLER: Sure. By tomorrow --		22
	23	MR. WALKER: I don't want to put you on the		23
	24	spot at this moment.		24
15:18:57	25	MR. MIGLER: Sure. I understand. But by	15:19:10	25

Page 218

1 I, Sandra Mitchell CSR No. 12553, Certified Shorthand  
2 Reporter, hereby certify that:

3 I am authorized to administer oaths or affirmations.  
4 (Cal. Code of Civ. P. Sec. 2093 (b) and Fed. R. Civ. P. 28(a)).

5 The foregoing proceedings were taken before me at the  
6 time and place therein set forth, at which time the witness  
7 was duly sworn by me. (Cal. Code Civ. Proc. 2025.330(a),  
8 2025.540(a) and Fed. R. Civ. P. 30(f)(1)).

9 The foregoing pages contain a full, true and accurate  
10 record of all proceedings and testimony. (Cal. Code Civ.  
11 Proc. 2025.540(a) and Fed. R. Civ. P. 30(f)(1)).

12 I am not a relative or employee of the parties,  
13 nor financially interested in the action. (Cal. Code Civ.  
14 Proc. 2025.320(a)).

15 Before completion of the proceedings, review of the  
16 transcript [ ] was [ x ] was not requested. If requested,  
17 any changes made by the witness (and provided to the reporter)  
18 during the period allowed, are appended hereto.  
(Fed. R. Civ. P. 30(e)).

19 I declare under penalty of perjury under the laws of  
20 California that the foregoing is true and correct.

21 Dated this 1st day of April, 2019.

22 \_\_\_\_\_

23 Sandra Mitchell  
24 C.S.R. No. 12553

A	actual 94:6 178:20 Adam 123:25 124:1,1 add 179:12 addition 176:10 178:10 additional 29:8 176:14 177:25 178:22 179:3 180:7 184:19 address 12:16 15:15 85:3 155:17 155:19,19 addressed 93:17 adds 178:17 admin 187:4 administer 43:10 218:3 administered 43:11 Administrate 30:18 Administration 1:9 2:8 4:10,11 5:12 7:25 8:9 9:16,21 10:16,18 11:15 12:4,9,13,24 15:8 15:25 16:14,21 17:12 18:7,11,25 19:4,11,19 20:8 20:19,22 21:15 23:24 24:17 25:2 25:12,15,18 26:3 26:22 27:7 28:11 29:6 31:2,4 32:4 32:20 33:7,13,24 34:11 35:17,21 37:7 38:9,22 39:9 39:14 40:4,12,21 41:2 43:15,20 45:21 50:10 53:1 54:25 55:8 56:12 56:25 57:16 58:8 58:10,11 59:8 60:16,25 61:17 62:3,19,24 63:16 63:24 64:8 65:5 65:10 67:12 68:6	68:19 69:1,25 70:2,4,9,12,13,21 76:8,12 77:1,6 79:22 80:1,9 83:24 84:14 85:8 85:11,20 86:13 88:8,14 90:16,21 90:24 97:13,17 98:7,15,22 99:7 99:21,24 100:17 101:18,24 105:23 112:12,20 113:15 113:20,25 114:5 115:7,12,22 116:2 116:9,15 117:11 117:16 118:10,20 119:12 120:2,10 120:18 125:12 126:24 127:10,21 128:1 129:15 130:2 131:14,23 136:23,24 137:4,7 137:9,11 138:1,4 138:8,13,16 139:7 139:15 140:18 141:3,7,12,24 142:13 145:12,19 146:17 148:4 153:5 155:23 156:23 157:14,17 158:24 160:20,23 161:16 164:3 165:7,15 166:17 167:2,6,21 168:11 169:7,14 170:3,12 170:21 171:7 177:8 179:25 180:2,8 182:11 183:18 189:23,25 190:10,21,23 195:13 197:2,11 198:3,25 199:14 199:22,23 200:9 201:15,19,25 202:2 203:11 205:11 206:15,21 206:24 207:1,5,15	207:19 208:12,20 209:7,18,25 210:3 210:6,10,22 211:11,19 212:2 213:5,20,25 <b>Administration's</b> 29:20 30:19 31:12 32:8 38:16 50:15 140:16,24 165:5 195:19 200:3 <b>administrative</b> 185:22,24 186:7 191:10 <b>adopted</b> 17:11 <b>advance</b> 25:19 118:12,15 148:19 200:22 <b>advanced</b> 25:20 147:24 <b>advances</b> 52:15 <b>advancing</b> 146:16 148:6,6,16,18,20 148:25 149:2,6 <b>advised</b> 202:1 <b>advising</b> 51:14 <b>Advisors</b> 196:7 <b>Advisory</b> 27:22 65:4 90:15 <b>Affairs</b> 103:24 <b>affiliated</b> 9:23 94:10 117:24 <b>affirmations</b> 218:3 <b>afford</b> 133:8 <b>agent</b> 15:16,24 16:3 21:14 <b>agents</b> 21:10 <b>ago</b> 21:17,17,24,25 21:25 22:9,10,10 38:25 73:13 74:17 92:14 103:23 106:25 109:22 118:23 121:12 128:23 134:5,8,8 129:22,23 215:8 <b>Amex</b> 50:3,23 51:2 51:8,16 52:6 78:18,22 86:8,11 87:20 89:1 91:3	77:4 79:18 80:12 83:21 90:18 126:7 183:17 <b>agreement</b> 28:4 100:2,4 126:2,3 141:14 146:18 149:2,13 156:10 157:3 160:13,16 160:18,21 163:6,9 163:17 166:12 <b>agreements</b> 55:20 71:11 103:13 146:22,23 147:1 164:25 <b>ahead</b> 93:19 187:16 <b>AI</b> 142:20 213:21 <b>air</b> 181:13 190:17 <b>Allan</b> 195:25 196:1 207:9,22 <b>allegation</b> 194:5 <b>Allen</b> 102:19,21 207:24,25 209:6 209:17,19 210:9 210:21 211:4 <b>Alliance</b> 198:20 199:17,18 200:22 201:1,2,3,6,20 <b>allocated</b> 176:16 179:9,19 181:8,10 185:1 191:1 <b>allocating</b> 179:6 180:16 190:13 <b>allocation</b> 176:10 176:14 178:1,12 178:15,23 179:3 180:7,18 184:19 <b>allowed</b> 218:18 <b>American</b> 51:5,19 78:23,25 79:2 81:13 86:14,17,21 86:23 89:4,6,9,12 89:14 91:11,20,23 129:22,23 215:8 <b>Amex</b> 50:3,23 51:2 51:8,16 52:6 78:18,22 86:8,11 87:20 89:1 91:3
---	---	---	--	--

111:8,12,13,14	<b>applied</b> 179:8	146:12 164:14	<b>attorney</b> 6:19 47:1	<b>backup</b> 188:5
<b>amount</b> 47:9 51:15	<b>appointed</b> 12:12	177:13,16,20	47:3 59:22 75:15	<b>bad</b> 213:2
117:3 138:16,20	<b>appointing</b> 12:3,8	183:13,13,15	162:1,4 164:20	<b>balance</b> 46:6
138:21 171:10,15	12:23	186:19 187:14,24	195:18,21 198:13	168:16
171:19 182:5	<b>appreciate</b> 96:18	188:2,8 193:17	198:14,15	<b>bank</b> 29:5,9,20
<b>amounts</b> 79:9	96:19	202:1	<b>attorneys</b> 6:8,21	30:12 32:8 54:19
106:23 176:7,8	<b>approximately</b>	<b>asking</b> 49:1 78:2,9	<b>attraction</b> 92:22	76:18 77:13 97:21
<b>analyst</b> 209:20	6:11 22:8 75:4	96:15,17 106:23	<b>auction</b> 130:13	100:17 112:17,21
<b>and/or</b> 134:16	95:6 111:18	192:6,9 196:10	<b>Auctions</b> 77:20,24	127:2 132:9
<b>Android</b> 134:5	116:20 123:22	207:13	78:3,10,15	181:18 182:11
<b>Angeles</b> 2:18 6:1,13	145:14 147:15	<b>assets</b> 27:6,9,10,13	<b>August</b> 11:6 14:1	183:12 213:8
<b>animation</b> 49:12	179:14,17	201:5	16:17 29:6,6,23	<b>banner</b> 200:10
<b>annual</b> 19:10,18	<b>April</b> 4:19,19 83:18	<b>assist</b> 11:20	29:23 139:7,13	<b>bar</b> 162:9
20:1,6 180:12	83:18 84:22 85:23	<b>assistance</b> 11:14	<b>Authority</b> 107:7,8	<b>Barnes</b> 5:14 198:8
<b>answer</b> 5:16 9:14	87:3,5 162:10	177:18	107:12	198:12,13 199:17
33:16 41:14 57:2	218:22	<b>assistant</b> 24:9	<b>authorized</b> 100:21	201:18,24
60:21 62:22 64:1	<b>arena</b> 145:16	70:25 163:22	218:3	<b>based</b> 17:24 88:9
64:5,9,11,12,19	<b>argument</b> 174:3	<b>Associates</b> 105:6	<b>available</b> 86:17	132:12 183:17
65:18 105:4	<b>Arial</b> 17:15	133:6	<b>aware</b> 28:10 32:19	190:1
191:24 192:10	<b>arrange</b> 32:16	<b>assume</b> 56:19 88:3	33:2,3,5,6,11 56:6	<b>basically</b> 179:11
<b>answer's</b> 55:10	34:15,18 52:20	97:23 100:1	56:8 60:24 63:23	<b>basing</b> 180:18
58:1 65:12,14,25	58:3 81:2	104:14 109:4	64:4,6 65:9 66:9	<b>basis</b> 142:3 181:12
<b>answered</b> 64:1	<b>arranged</b> 32:13	190:1	93:18 95:5 160:18	187:20
163:13 186:23	52:13 60:9 63:22	<b>assuming</b> 87:19	161:4,21,24 163:9	<b>Bates</b> 13:20 15:5
187:14 190:4,18	66:6	114:19 116:5	163:17 205:25	16:10,12 18:22
191:23,25	<b>arrangement</b> 126:3	121:9,11 132:11	<b>awhile</b> 21:17	38:10 153:13
<b>answering</b> 71:2	146:19,19 148:22	<b>Assured</b> 104:15	<b>Ayaay</b> 17:16	161:8 189:3 193:1
<b>answers</b> 60:20	148:24 149:2,6	105:8	<hr/>	203:2 206:17
141:19 217:7	<b>arranging</b> 25:18	<b>AT&amp;T</b> 122:15,22	<b>B</b>	209:4
<b>antiques</b> 50:4	36:2 66:5 69:13	122:23,24 128:20	<b>b</b> 4:7 5:2 218:4	<b>bearing</b> 96:18
51:24 52:3	69:17	128:20,22 133:20	<b>B1123</b> 3:14	<b>becoming</b> 69:8
<b>anybody</b> 64:17	<b>arrived</b> 88:24	133:21,22,23	<b>back</b> 25:20 26:5	<b>began</b> 201:7
<b>anymore</b> 24:6,13	<b>arrow</b> 97:12 98:6	134:1,16,20	31:1 39:3,6 51:6	<b>beginning</b> 8:24
152:15 193:12	98:14 101:17,17	135:22	52:19,20 54:14,17	<b>behalf</b> 2:17 14:17
212:21	102:5 105:10,16	<b>Atlantis</b> 201:3,6	61:23 76:18 87:2	28:4 55:20 199:15
<b>apologize</b> 96:20	106:2 110:20,23	<b>attached</b> 8:6 10:8	90:9 96:10 100:1	205:12
188:19 192:16	113:23 115:6	38:2 44:15 48:3	100:8 109:3	<b>believe</b> 9:20 19:23
202:20,22	120:17 128:12	66:21 71:22 76:2	118:14 119:21	19:24 27:5,10
<b>apparently</b> 140:20	129:14 130:1	79:14 83:15 87:13	121:9,19,23	41:22 44:22 45:4
141:14	132:25 136:22	89:19 96:25 112:1	122:17 125:24,25	46:25 49:21 51:4
<b>appear</b> 14:9 96:19	<b>arrows</b> 113:21	113:1 119:2	128:20 133:23	92:5,8 107:16
<b>APPEARANCES</b>	120:14 127:25	126:17 131:6	136:22 137:4	110:3,5,19 111:11
3:1	<b>Articles</b> 15:8	137:16 138:25	147:25 148:2,21	116:14 122:20
<b>appears</b> 40:18	<b>articulated</b> 117:13	152:22 172:9	148:21,25 153:21	124:2,8 126:4
136:22 198:24	<b>asked</b> 10:20 57:25	197:18 205:17,22	171:14 172:1	133:20 134:9
201:12 209:6	65:17,19 67:19,24	<b>attention</b> 36:13	194:1 214:18,19	136:1 138:15
<b>appended</b> 218:18	74:13 103:8	61:15	214:24 215:16	139:17 143:14

144:18 145:2	90:19 97:5 112:5	<b>birthdays</b> 83:7	<b>bring</b> 192:20	<b>Cahela</b> 3:18 6:5
146:3 147:25	119:5 124:9	<b>bit</b> 83:10 96:15	<b>bringing</b> 68:2	<b>Cal</b> 218:4,7,10,13
149:23 158:6	126:20 131:9	126:12 148:8	142:2	<b>calculated</b> 180:3
172:17,21 174:18	137:19 139:3	<b>black</b> 51:2,16 78:23	<b>Broadway</b> 69:22	<b>calculation</b> 182:22
174:24 175:15	140:5 141:22	83:10 86:14,24	92:3,9,19 93:1,3	<b>calculations</b> 174:25
184:10 189:5,7	174:20 198:15	89:4,9,13 91:12	93:10,14 94:23	<b>California</b> 1:2 2:2
193:5,16,19	208:5	91:21 111:8,12,13	95:6,15,19,21	2:18 3:14 6:1,13
195:15 212:15	<b>best</b> 26:16 99:15	129:23	140:11 142:1,10	6:16 10:16 27:3,4
213:20 214:5,12	121:13	<b>blah</b> 114:22,22	142:17,19	107:7,8,11 162:6
215:11	<b>beyond</b> 195:11	133:13,14 144:16	<b>brought</b> 58:7 142:7	162:10 217:1
<b>benefit</b> 80:24	<b>Biedak</b> 189:9 191:8	144:16	150:2,7,8	218:21
<b>benefits</b> 70:6	<b>big</b> 74:5 83:10	<b>blank</b> 186:15,25	<b>bucks</b> 53:5 81:23	<b>call</b> 81:22 126:6
104:15 118:17	92:18,19,20,21	191:15	83:11 92:24	148:23 202:21
<b>Bergstein</b> 1:9 2:9	95:22 167:11,15	<b>board</b> 19:10 20:7	109:16 110:16	<b>called</b> 25:21 64:15
9:23 24:2 25:7	187:2	27:4 42:15 93:25	<b>building</b> 82:1	93:3 99:12 152:10
26:1 48:6 49:22	<b>biggest</b> 93:1,2	94:1	123:16	152:11 207:17
50:21 51:15 53:11	<b>bill</b> 50:17 51:19	<b>body</b> 45:19	<b>bullshit</b> 188:14	212:24
61:4,12 63:1 66:6	81:13 86:14,24	<b>book</b> 58:24	<b>bunch</b> 31:18 36:3	<b>cameras</b> 94:3
67:9 68:5 69:14	91:24 106:9,10,18	<b>books</b> 34:24 59:12	42:25 69:3,8	<b>Canada</b> 201:3,9
69:18 71:24 73:5	111:6 121:2 122:9	196:5	107:24 133:12	<b>canceled</b> 174:8
76:5,7 77:11 78:1	122:19 129:1	<b>Boson</b> 199:1,7,8	157:14 164:10,15	<b>capacity</b> 7:21,24
78:6,8,18 79:17	155:11,23 158:12	202:3,5,7,8	195:16	28:5
79:21 81:1,6,11	158:13 208:17	<b>bottom</b> 8:18,19,24	<b>business</b> 22:1,4,5	<b>CAPISTRANO</b>
81:18 82:14,22	210:25	11:2 13:20 14:5	23:4,25 24:5,11	3:14
85:22 87:2,16	<b>billed</b> 156:19 207:3	17:15 26:9 30:14	24:17 25:2 31:18	<b>Capital</b> 196:25,25
89:22,25 90:3	211:1	79:20 84:3 97:7	36:22 45:6 49:13	<b>car</b> 70:7
91:3,8,10 95:14	<b>billing</b> 31:17,17,24	113:24 130:17	51:9 103:24 118:9	<b>card</b> 51:2,8,16,19
117:24 118:2	43:1 143:6 144:4	160:25 166:20	52:15 78:23,25	52:15 78:23,25
123:12 125:8	144:11 145:25	168:15 184:1	79:2 86:14,24	79:2 86:14,24
132:14 143:10,15	149:12 150:23	<b>bought</b> 54:2,3,3	89:5,9,13,14	89:5,9,13,14
143:21 149:15,17	151:12,23 152:5,7	135:8 159:23	91:12,21 111:2,6	91:12,21 111:2,6
150:22 151:8,24	159:14 161:24	199:24	111:8,12,14	111:8,12,14
152:3 155:1,20	208:1,2	<b>Boulevard</b> 2:17	129:23	129:23
159:13 161:19	<b>bills</b> 32:15 50:2,13	6:12 106:15	<b>cards</b> 111:15,19	<b>car</b> 68:3 114:12
162:12 164:2	50:14 51:12 58:6	155:24,25	118:9 203:11	118:9 203:11
167:14 176:12	72:4,17,22,23,24	<b>box</b> 97:10 98:3	<b>Carol</b> 36:23 37:9	<b>Carpenter</b> 163:21
178:25 184:2,22	73:2 81:3,14,15	102:4 113:19,21	77:19,24 78:3,10	163:22
185:15 186:15,17	81:15,16,17,21,22	128:13	78:14 130:7,13	<b>carrier</b> 128:20
187:6,12,24	82:2,7,9,10,11,12	<b>boxes</b> 214:3	157:6	134:6 136:13,16
189:12,15 193:17	89:11 99:22 100:7	<b>branch</b> 37:14,21	<b>Carroll</b> 98:17,23	99:2 124:9 178:14
194:16,18 202:6	104:17 105:8	<b>Brandon</b> 3:18 6:5	99:9 191:8	189:9 191:8
203:11 205:17	106:20 109:3,5	<b>break</b> 54:10 96:4,5		
207:20 208:14	114:7,10,13,20	171:22 202:12		
212:17,19	117:16 118:18,22	214:14		
<b>Bergstein's</b> 53:10	128:8,9,10,10,11	<b>breakdown</b> 46:21		
67:12,23 77:19	151:2 155:21	176:23		
80:13,20 86:6	157:17	<b>breaking</b> 96:1		
			<b>C</b>	
			C 17:16 123:3	
			186:6	
			<b>C.S.R</b> 1:22 2:20	
			218:25	
			<b>cable</b> 135:23	
			CAC 75:18,19	

carved 185:21	122:19	204:25	11:17,17 18:14	company's 32:13
<b>CASCADE</b> 1:10 2:9	<b>changes</b> 193:25 218:17	<b>clearer</b> 180:5	20:18,23 21:3,10	<b>compensation</b> 71:3 71:5,6 164:22
<b>case</b> 1:6 2:6 6:14,17 38:9 51:6 56:19 57:9 58:6 97:24 114:19 153:8 188:24 190:25	<b>characterization</b> 59:4	<b>clearly</b> 63:4 86:5 140:2 215:9,11	31:9 47:15 69:4,9 88:21 94:10,15,16	189:20,24
<b>cash</b> 45:14 52:15 72:3,11 100:11,16 100:19 101:3,5,7 192:21	<b>characterize</b> 59:2	<b>client</b> 45:1	94:18,21,22	<b>compile</b> 190:2 193:18
<b>catch</b> 50:1	<b>characterized</b> 45:5	<b>close</b> 195:23	105:14 124:17	<b>complete</b> 12:16
<b>category</b> 184:19	<b>charge</b> 123:14 135:14	<b>closed</b> 201:3	142:20 163:24	<b>completely</b> 26:23 212:23
<b>caught</b> 51:13,19	<b>charged</b> 51:21	<b>closely</b> 25:23	164:1,2,4 195:8	<b>completion</b> 218:15
<b>cause</b> 7:6 81:21 174:24 179:8 194:14	<b>charges</b> 51:20 52:6 52:7 155:6 166:7 168:1,7 169:1,17 170:6 171:1	<b>co-officing</b> 10:20	200:1 207:16,16	<b>comprised</b> 179:4
<b>ceased</b> 25:4	<b>Chart</b> 5:5,6,7,8,9	<b>Coast</b> 77:19,24	<b>company</b> 9:17	<b>computer</b> 175:9 204:23,25 205:1
<b>cell</b> 122:21,22 128:18,19,24,24 129:1,2,3 133:22 134:2	<b>Chatsworth</b> 214:10 214:11,13	78:3,10,15	10:16,20 11:13	<b>concerned</b> 31:8 165:16
<b>Center</b> 123:4	<b>check</b> 84:4 101:2,5	<b>Code</b> 27:3 218:4,7 218:10,13	13:1,8,11,14 15:12 16:17 17:2	<b>concluded</b> 216:8
<b>Central</b> 1:2 2:2 6:16	115:19 116:11	<b>COLE</b> 3:3,8	17:6,8,23 18:19	<b>concludes</b> 216:5
<b>CEO's</b> 144:2	123:6 141:17,18	<b>collateral</b> 149:5,7	21:8 23:1,3,22	<b>conducting</b> 23:4,25
<b>certain</b> 37:17 51:15 115:3 145:7,24 162:20	148:12 204:17,18	<b>colleague</b> 28:8,14	24:13 25:21,24,25	<b>connected</b> 53:20
<b>certainly</b> 159:15 160:6	205:2,4	49:1 138:18	26:2 31:25 32:5	<b>connecting</b> 110:23
<b>Certificate</b> 16:20 22:24 23:11	<b>checking</b> 36:22	146:12	32:11 36:1 46:2	<b>connection</b> 21:2 28:12,19 149:6 188:9 194:17
<b>Certified</b> 218:1	<b>checks</b> 68:24 79:6	<b>collect</b> 110:13	46:11 47:16,18,20	<b>consider</b> 69:24 212:20
<b>certify</b> 218:2	84:23 117:1	151:4	52:11,12,23,24	<b>considered</b> 159:5 162:24 163:4
<b>cetera</b> 32:15 50:3 58:6 72:5 114:9,9	140:20 142:3	<b>collected</b> 147:21,23	55:21 58:15,20	<b>consists</b> 10:14 15:7 16:13 29:8 83:17 197:25
<b>CFO</b> 58:9 59:7	164:16 167:9	<b>Colorado</b> 106:15	64:15 66:7 67:23	<b>construction</b> 196:15,18
<b>chair</b> 53:18	174:8	<b>combination</b> 185:6	75:19 81:22 85:5	<b>consultant</b> 94:13 102:21,22 140:11 150:8 196:2
<b>chairs</b> 53:12 54:5	<b>chief</b> 11:23 12:3,11	<b>combine</b> 185:14	88:15,19 92:2	<b>consulted</b> 69:22
<b>chance</b> 9:10 153:2 172:11	12:12 13:8,14	<b>combined</b> 185:16	100:5,6 102:2,22	<b>consulting</b> 32:25 61:5 94:22,23
<b>change</b> 13:3 55:10 57:2 194:11,14	58:13,16	<b>come</b> 32:16 34:15	102:25 103:1	103:13 141:25
<b>changed</b> 24:5,11 25:12 57:24	<b>circle</b> 110:23	34:17,17,18 41:23	114:3 118:13,13	142:4,9,11 146:4 146:7 156:6,18,23
		42:1 66:7 71:12	121:10,17,17	157:1,4 158:24
		71:13 88:20 90:20	122:20 124:2,4	159:5,6,9 160:12
		<b>circle</b> 110:23	125:22 128:10	161:14,20 162:13
		104:17 118:12	129:2 130:25	162:18,21,23,24
		124:18,21 150:8	135:24 140:18	162:25 163:4,11
		165:14 176:24	141:4 142:14,18	166:11,16 168:12
		182:21 184:18	143:5,10 144:11	
		185:4 200:1,8	148:14 152:6	
		214:18	153:22 157:5	
		<b>comes</b> 87:19 91:3	159:8 164:3,9,17	
		<b>coming</b> 46:1 58:2,2	164:18 165:17,18	
		58:19 59:2 60:2,8	167:12,15 174:2	
		63:21 87:24 88:2	188:13 193:6,10	
		88:7 91:19 105:21	194:6 196:9 199:8	
		107:11 114:12,15	199:10,11,13,24	
		141:16	200:4,7,12,17	
		<b>commence</b> 200:22	201:2,2 203:15	
		<b>commencing</b> 2:18	205:12 207:12,17	
		<b>companies</b> 9:22	208:5,6,7,12,13	
			213:9	

169:8,23 170:13	50:24 51:11,17	<b>COUNTY</b> 217:2	6:17	182:20 185:23
171:8 209:10,17	57:4 59:15 60:3,4	<b>couple</b> 16:2 22:9	<b>Cyrano</b> 25:21,23	186:22 193:23
210:15,20	63:6,17,18 67:10	53:12 74:9 83:11	<b>D</b>	194:18 195:8,16
<b>contain</b> 218:9	71:25 76:5 78:24	134:5	<b>D 5:1</b>	195:22 196:3
<b>context</b> 50:11	81:5,13 82:15	<b>course</b> 129:6	<b>D.B</b> 87:18	197:8 198:15
<b>continue</b> 46:17,18	83:19,24 84:10,11	<b>court</b> 1:1 2:1 3:9	<b>DALLAS</b> 3:4	199:8,16,24 202:1
<b>Continued</b> 5:1	85:20 86:15 87:7	6:16 7:2 8:5 10:7	<b>Daniel</b> 109:7	202:6,10 203:11
<b>continues</b> 46:4 47:6	87:16 88:16,17,18	38:1 44:14 48:2	<b>date</b> 14:1 44:3	203:22 204:6
49:25	89:5,22 90:16	66:20 71:21 76:1	143:8 147:11	207:10,17,20
<b>continuing</b> 8:25	91:5,13,21,24	79:13 83:14 87:12	161:13 198:8	208:6 209:20,23
12:15	92:3,10,11 97:21	89:18 96:24	206:14 212:7	<b>David's</b> 31:20
<b>contracted</b> 6:6	98:12,25 101:15	111:25 119:1	217:11	73:24 103:5,5
<b>contracts</b> 162:2	105:13 110:24	126:16 131:5	<b>dated</b> 30:16 33:19	131:2 157:8
164:11,25	114:4 117:25	137:15 138:24	36:14 44:17 60:14	182:13 196:13
<b>control</b> 66:7 215:10	123:13 125:14,17	152:21 172:8	67:1 71:25 76:23	<b>day</b> 11:9 68:14,14
<b>conversation</b>	128:16,23 130:16	197:17	87:16 90:14	68:14 71:2 81:2
173:24	138:21,21 143:2	<b>cover</b> 46:19 127:13	154:16 166:2	86:7 87:1,23 88:4
<b>cool</b> 45:3	152:5 155:20,21	137:8	167:20 168:24	158:16,21 218:22
<b>copier</b> 69:5 114:9	156:1 166:18	<b>covering</b> 114:10	203:7 210:10	<b>day-to-day</b> 187:20
<b>copies</b> 154:12	167:22 168:12	205:17	218:22	<b>days</b> 137:10 215:7
177:15 205:6	169:23 170:3,13	<b>CPA</b> 44:25 84:18	<b>dates</b> 38:7 170:19	<b>deal</b> 33:16 49:17
<b>copy</b> 28:23 138:25	170:21 171:8,12	<b>create</b> 102:23	<b>David</b> 3:13 10:19	136:13 187:2
175:1 204:18,18	171:16 176:4	153:23 158:25	24:5 25:11,14,16	195:22 201:10
<b>corner</b> 13:21 155:5	178:5,6 180:8,16	165:13 173:4,22	31:5,7,19 32:11	208:8,10,16
167:25 170:24	183:19 184:9,23	<b>created</b> 41:13,14	32:23,23 33:14	<b>dealing</b> 149:16
<b>Corp</b> 1:10 2:9	185:1,2 188:9	154:8,20 172:15	34:13,14 36:1	186:22
132:4,10	189:6,10 190:11	172:16,20 173:2	41:3,8 42:21 43:2	<b>deals</b> 25:16,19,20
<b>corporate</b> 4:11	190:12 191:6,10	173:11 175:4	43:7 55:18 58:3,3	32:25 36:3 43:1
7:24 10:15 11:12	191:11,13,16,17	177:21 181:2	60:5 61:4,11 63:1	61:5 64:14,18
17:6 19:20 20:14	191:20 193:4,8	188:20	63:21 64:14 66:4	140:9,10,10 165:9
20:17 23:18	199:15 201:13	<b>creation</b> 207:8	66:4,6,12,13 67:8	195:23,24 196:6,6
114:20 128:10	203:8 206:21	<b>credit</b> 52:15 111:2	67:19,24 69:6	199:19 207:16
144:23 145:4	208:14 209:7	111:6,6,12,14,15	72:14,15 74:9,10	209:20,23,24
158:14	210:13 213:6	111:19	74:12 75:17 82:24	210:5
<b>corporation</b> 27:8,8	217:7 218:21	<b>criminal</b> 97:5	83:4 93:16 95:10	<b>Dear</b> 205:16
132:11 145:5,6	<b>correcting</b> 101:13	112:5 119:5	95:14,21 102:24	<b>debt</b> 100:9
<b>corporation's</b>	<b>correctly</b> 12:18	126:20 131:9	103:3 114:14	<b>December</b> 43:15
15:15	15:18 46:7,22	137:19 139:3	118:2 132:16	95:5 112:13
<b>correct</b> 7:21 8:1	47:12 48:10 50:7	174:4	141:16 149:14,15	113:15 170:2
9:18,23 12:5,7,10	67:6 72:6 77:16	<b>CSR</b> 218:1	149:15 150:18	171:19
12:14 13:23 14:10	81:4,9 84:6 86:9	<b>curious</b> 35:6	151:10 157:4	<b>decide</b> 81:20
14:11 15:9,10,13	87:21 134:3	<b>current</b> 128:20	159:6,12 161:19	<b>deciding</b> 72:18
18:8 20:2,19,25	150:13 205:20	133:22 196:6	162:16 164:10,12	<b>decks</b> 196:5
23:2 28:6 32:6	<b>cost</b> 174:14	212:16	164:21,22 165:8	<b>declare</b> 217:6
36:10 37:19 38:10	<b>Counsel</b> 93:9	<b>currently</b> 162:7	165:11 173:24,25	218:20
42:12 44:24 45:1	202:11	<b>custody</b> 215:10	176:11 178:14	<b>decreased</b> 171:19
46:16 47:15 48:6	<b>country</b> 142:6	<b>CV-6633-CAS-A...</b>		<b>dedicated</b> 177:4

178:10,22	<b>desk</b> 157:8	<b>discount</b> 151:4	177:25 178:21	179:9 186:21,22
<b>defendant</b> 4:9 6:25	<b>detailed</b> 46:21	<b>discovery</b> 38:9	180:21,21,24	187:20 189:17
7:25 8:9 215:5	<b>details</b> 147:6	41:17 57:9 153:8	181:2 183:18,20	192:20 194:2
<b>Defendants</b> 1:11	150:10 201:11	153:10 206:5	187:1,22 188:21	196:17 199:16
2:10 3:12	<b>determine</b> 59:4	<b>discuss</b> 9:12	188:24 192:25	200:4 202:8
<b>defending</b> 187:25	<b>determining</b>	<b>discussed</b> 27:16	193:18,25 194:4	206:16 207:10,10
<b>Definity</b> 84:9,15,15	177:10	120:1,9	194:10,17,24	207:11 209:21
<b>Defrank</b> 144:1	<b>Deutsche</b> 181:18	<b>discussing</b> 50:10	197:22 205:24	<b>dollars</b> 138:19
149:24 150:3,4	182:11	<b>discussion</b> 78:5	206:5	<b>Don</b> 98:17 157:5
152:1 159:7	<b>developed</b> 42:2	95:10,14 151:9,11	<b>document's</b> 20:6	176:12 178:14
<b>deliver</b> 135:12	<b>developing</b> 69:21	193:20	<b>documents</b> 4:11	186:6
<b>department</b> 106:7	<b>devoting</b> 179:16	<b>discussions</b> 95:17	10:15 11:12 13:21	<b>door</b> 53:16
107:2 185:22	<b>different</b> 134:12	194:21,23	17:7 20:14,18	<b>doubt</b> 168:21
<b>depending</b> 50:17	136:2,13,16	<b>Dissolution</b> 22:24	21:2,4,6 23:18	183:21
215:4	148:17 158:11	23:12	33:11 55:22,24	<b>dozen</b> 213:12
<b>depicted</b> 105:20	161:13 176:2	<b>dissolve</b> 152:17	56:2 57:4,8 58:17	<b>dozens</b> 158:15,17
<b>depo</b> 93:11	200:19	<b>dissolved</b> 26:23	59:3 61:8,12	164:11,11 213:11
<b>deposed</b> 7:20,24	<b>Digitally</b> 175:14	27:13	64:21 66:9,13	<b>draft</b> 14:15 162:2
<b>deposit</b> 30:18 86:4	<b>diligence</b> 199:17,18	<b>distance</b> 136:13,16	73:25 74:19,23,24	195:21,21
<b>deposited</b> 85:23	200:4,11,23 201:1	<b>distributed</b> 27:7	74:25 75:2 138:18	<b>drafted</b> 99:14
<b>deposition</b> 1:16	201:8,11,20 207:8	<b>distributor</b> 201:8	153:7,9 164:11	164:24,25,25
2:16 4:9 6:11,18	207:22 209:21	<b>District</b> 1:1,2 2:1,2	165:1 183:6,11	194:3,9
6:19 8:9 28:20	<b>diligencing</b> 199:20	6:15,16	185:8 195:22	<b>draw</b> 100:25
39:4 54:18 76:19	<b>direct</b> 15:14 16:9	<b>Division</b> 6:16	197:6	<b>drawn</b> 100:16
216:6 217:6	17:14 18:21 26:5	<b>divvy</b> 72:3	<b>doing</b> 22:1,3,5,6	<b>drive</b> 37:13 135:11
<b>deposits</b> 58:7	29:2 30:6,13	<b>divvying</b> 72:10	24:17 25:2,11,14	135:12
183:14	35:11 61:15 63:14	<b>docs</b> 49:8,11,12	25:16 26:2,4 31:6	<b>driving</b> 135:7
<b>Depot</b> 124:25 125:4	65:1 76:21 82:18	<b>document</b> 8:10,15	31:7,8,8,12,15,20	<b>Dude</b> 72:2 86:7
<b>describe</b> 10:13 60:1	91:16 176:9	10:11 11:5,11	32:1,23 33:1,3,5	<b>due</b> 73:17 86:20
150:11	<b>directed</b> 78:14	14:13,15,18 15:5	34:16 36:3,4 43:3	89:6 161:1
<b>described</b> 29:22	198:3,4,25 203:10	15:11 17:2,24,25	43:3,8 55:18 59:6	<b>duly</b> 7:13 218:7
46:25 59:21	<b>directing</b> 46:13	18:1,6,24 19:6,9	61:3,4,5,7 62:8,17	<b>Dunode</b> 123:25
102:13 140:15,17	91:8	26:15,19 27:2	62:20,21,24 63:2	<b>DWP</b> 106:2
141:4 147:13	<b>direction</b> 157:4	28:7 29:17 38:4,8	63:4,4 64:13,14	<hr/>
150:24 151:16	159:10	38:13,18 39:11	66:4 68:7,9,25	<b>E</b>
164:17 187:21	<b>directly</b> 86:19	40:15 41:13,16,24	69:10,13,17 70:24	
201:21 208:4	101:7 103:3	44:2,4 84:9 97:2,4	70:25 84:20 95:11	
211:25	200:15	99:14 105:21,25	109:15,23 124:2,6	
<b>describing</b> 211:22	<b>director</b> 12:24 13:1	106:22,24 107:5	124:16 126:7	
212:1	49:16 93:25 94:1	112:9 119:7,14	132:16 140:20,21	
<b>description</b> 4:8 5:4	<b>directors</b> 12:17,17	120:25 121:12	140:24 147:23	
156:4 166:11	19:10 20:7	136:18 137:25	149:14 157:6,6,12	
191:5	<b>DirecTV</b> 108:13,16	139:5,11 153:1	157:19,21 159:9	
<b>designated</b> 15:23	108:19,20,22	172:12,15,16,23	159:10,12 161:20	
21:9,14 97:6 98:3	109:1 136:8,10	173:3,22 174:12	161:22 162:3,16	
112:6	<b>disagree</b> 41:19	174:19 175:1,12	162:17 163:1	
<b>designating</b> 15:24	<b>disbarred</b> 162:5,6	175:16 177:12,21	176:14 178:16	
				77:19 78:18 79:21
				80:13,16 81:7

82:13 84:3,22 85:3,7,11,23 86:7 87:15 88:11 89:21 89:24 90:19 91:2 91:22 130:11 202:16 203:22 204:21 <b>e-mailed</b> 154:8 204:14,24 <b>e-mails</b> 4:19 49:2 79:16 83:17,23 205:1 <b>earlier</b> 62:9 88:4 97:21 111:11 119:24 120:1 121:14 128:20 130:9 140:2 166:8 213:19 <b>early</b> 94:3 95:25 96:3 <b>earthquake</b> 107:7 107:8,12,13,15,22 107:25 108:2,6 <b>easier</b> 200:16 <b>Ed</b> 144:1 149:24 150:3,4 159:7 <b>effect</b> 152:8 <b>effectively</b> 148:22 <b>effectuating</b> 63:5 <b>eight</b> 73:12 106:24 106:25 <b>either</b> 16:5,7 30:10 52:25 53:1 121:23 121:24 124:5 133:23 135:20 177:13 185:12 188:11 190:4 <b>ELATZER@CO...</b> 3:10 <b>electronic</b> 175:2 204:19 <b>electronically</b> 154:10 <b>elements</b> 93:4 <b>eLitigation</b> 6:6 7:3 <b>embezzled</b> 45:1 <b>employ</b> 200:15,15	<b>employed</b> 70:9,12 85:12 <b>employee</b> 6:8 44:23 62:19,24 66:24 85:5,8,19 104:15 146:13,22 164:9 218:12 <b>employees</b> 24:6,7 24:13,14,15 25:3 25:4 31:4,12,14 31:15,19 61:3,23 62:1,3,14,16 64:13 70:15,19 85:13 123:21 142:16 144:14,14 146:10,11,14,16 146:20 157:24,25 163:1,2 164:19,20 174:7 176:9,11 177:3,5,6,7 178:10,22 179:5 182:23 188:15,16 193:13 194:6 197:13 200:8,15 202:3,4,6 207:15 214:1,2 <b>employer</b> 133:13 <b>employment</b> 146:22,23,25 164:25 <b>ended</b> 54:4 69:8 200:12 <b>entail</b> 92:17 <b>entertainment</b> 104:8 196:16 198:23 201:5 <b>entirely</b> 118:2 <b>entirety</b> 49:5 <b>entities</b> 5:10 22:6 24:21 25:1 70:17 75:20 84:19 98:22 102:6 103:3 117:23 118:1,3,3 118:4 137:22 140:6 164:19 181:8 200:14,19 213:5	<b>entitle</b> 141:13 <b>entitled</b> 17:11 19:9 20:6 26:19 27:7 156:4 175:18 <b>entity</b> 23:5,6 71:13 86:18 114:18 117:23 137:25 144:12,13 149:9 149:10 152:9,11 152:18 167:10 174:11,17 210:4 <b>entity's</b> 152:14 <b>entrance</b> 92:24 <b>entry</b> 36:21 99:2 100:10 101:11 106:2 108:12 129:8 130:17 133:19 186:14 <b>EPLI</b> 133:13 <b>Eric</b> 3:8 6:20,23 <b>escrow</b> 132:4,10,11 <b>ESPADA</b> 3:14 <b>ESQ</b> 3:3,8,13,14 <b>establish</b> 10:17 17:2,5,8 30:9 145:9 <b>established</b> 20:22 46:12 144:12,13 145:8,11,13,15,18 152:9,11 160:10 <b>establishing</b> 11:15 et 32:15 50:3 58:6 72:5 114:9,9 <b>EUGENE</b> 1:9 2:8 <b>evaluating</b> 140:10 <b>Evan</b> 84:9,16 <b>entirely</b> 118:2 <b>entirety</b> 49:5 <b>entities</b> 5:10 22:6 24:21 25:1 70:17 75:20 84:19 98:22 102:6 103:3 117:23 118:1,3,3 118:4 137:22 140:6 164:19 181:8 200:14,19 213:5	<b>example</b> 24:20 141:25 <b>Excel</b> 173:1 175:4,7 175:15 <b>exchange</b> 32:21 34:12 63:25 64:8 65:11 <b>exchanged</b> 79:16 83:18 <b>excuse</b> 87:24 <b>executive</b> 11:23 12:4 13:8 <b>exhibit</b> 4:9,11,12 4:13,14,15,16,17 4:18,19,21,22 5:5 5:6,7,8,9,10,11,12 5:13,14 8:3,4,8 10:5,6,14,23 13:16 16:10 22:22 26:6,8 28:19 29:8 29:25 37:24,25 39:3,12,23 40:6 40:15 43:12 44:12 44:13 47:25 48:1 54:18 66:16,19 71:19,20 75:24,25 76:19 79:11,12,16 80:4 83:12,13,17 87:9,11,15 89:16 89:17,21 90:9,14 96:22,23 97:5,6,9 98:1 111:23,24 112:4,4,6 118:24 118:25 119:4,4,5 119:10,21 120:6 126:13,15,19,19 126:21 127:4,17 131:3,4,8,8,10,17 132:1,17 137:14 137:18,18,20,21 138:22,23 139:2,2 139:3 152:20,24 172:5,7 197:15,16 197:24 202:25 <b>existed</b> 174:3 <b>existence</b> 21:16 23:8 152:15	<b>expanded</b> 41:9 <b>expenses</b> 25:19 51:8 79:4,5,7,10 99:17 102:17 114:24 115:4 121:15,20 146:16 148:20,25 181:9 <b>experience</b> 21:2,12 144:3 159:13,16 161:24 <b>expert</b> 150:9,12 <b>experts</b> 143:24 <b>explain</b> 178:7 <b>explained</b> 41:9 <b>Express</b> 51:5,19 78:23,25 79:2 81:13 86:14,17,21 86:24 89:4,7,9,12 89:14 91:12,20,24 129:22,23 215:8 <b>expressed</b> 152:4 <b>extensive</b> 199:18 201:7 <b>extent</b> 52:12 100:5 126:11 149:13 204:24 <b>eye</b> 86:22
<b>F</b>				
<b>f</b> 175:19 <b>F/A/O</b> 198:25 199:4,6 <b>F/S/O</b> 199:5 <b>facilitate</b> 37:8,18 <b>facilitator</b> 130:15 <b>fact</b> 20:23 53:25 88:5 139:17 148:2 160:9 162:4 184:21 215:9 <b>fair</b> 23:23 69:12,16 82:4 128:25 173:17,19 191:3 <b>familiar</b> 20:22 21:1 21:9 <b>family</b> 45:6 80:24 <b>far</b> 27:12 31:8 64:17 165:15				

Farden 124:15	find 182:20	floor 2:18 6:12	frustrated 96:19	gate 118:11
Fargo 29:5 38:6 99:12 112:21 181:19,23,23 182:12	fine 202:18	flowing 117:22	frustrating 192:8	general 183:16
Farmers 77:13	finish 24:24 59:24 64:6 67:20 102:9 141:9 194:7	focus 29:12 36:13 98:14 161:23 176:18	Frymi 70:24 74:9 153:20 154:6 157:7 176:12	190:10
favor 192:10	fire 82:3	focusing 177:24	177:13,15 178:14	generally 10:13
February 4:16 35:12,12,15 36:9 40:1 71:25 119:12 119:22 120:2,10 198:8 203:7,21	firm 5:14 37:4,4,8 59:11 101:14 103:25 104:1,4 181:6 186:9 191:12 198:8,12 201:19,24	folded 200:1	185:12 186:6	29:3
Fed 218:4,8,11,19	first 10:23 11:22 18:24 29:13,21 30:16 33:19 35:15 36:14 40:9,11,23 43:24 44:1 45:19	folks 46:20 95:15 165:1	190:5 195:17 202:5 205:14,15 207:20	generate 69:10,23 165:8,10,12,13
fee 92:24 142:7	foregoing 19:8 46:5 140:4 141:21 176:11 179:5	following 19:8 46:5 140:4 141:21 176:11 179:5	Frymi's 147:5	generated 64:19
feed 69:10	follows 7:14	forever 110:13	full 69:6 218:9	106:25 140:12
feel 55:10 57:24 187:9	foregoing 217:6 218:5,9,21	forgotten 95:8	full-time 176:14 178:13	142:6,19
fees 156:7,18 160:12 166:11,16 180:17	form 32:2 37:14 71:8 132:4 175:2 204:20	form 32:2 37:14 71:8 132:4 175:2 204:20	fun 83:7	generating 148:8
feet 74:6	formality 19:20	formal 110:13	functions 140:24	gentleman 46:25
field 143:24 150:9 150:12,14	Forman 15:19	forgotten 95:8	fund 1:4 2:4 3:2,7 6:14 10:22 34:13 36:6 60:2 70:3 84:23 149:13 159:25	49:15 196:14
fifth 101:10	format 175:12	form 32:2 37:14 71:8 132:4 175:2 204:20	fund 1:4 2:4 3:2,7 6:14 10:22 34:13 36:6 60:2 70:3 84:23 149:13 159:25	gentlemen 96:4 143:24,25
file 15:1 23:11 35:5 154:12 175:7	formation 11:12 20:17	formality 19:20	getting 121:24 142:3 147:24	getting 121:24
filed 6:15 14:24 15:11 27:3,4 194:16	formed 16:17	Forman 15:19	151:9,10,12,13	giant 95:12 167:15
fill 37:14 60:11	former 196:13	format 175:12	152:4,7 156:19	give 59:23 81:23
filled 11:13	forming 15:12	formation 11:12 20:17	192:8	141:25 197:21
film 75:1,3 92:20 103:9 159:23	forth 218:6	formality 19:20	213:14	213:14
filmmaker 49:16	found 150:19 162:16 187:19	formed 16:17	given 121:10	given 121:10
Films 196:25 197:1	founded 55:21	former 196:13	Glendale 146:2	Glendale 146:2
final 27:2	four 173:12	forming 15:12	158:9,15,20	158:9,15,20
finally 21:20	fourth 101:10	forth 218:6	go 37:11,21 50:18	go 37:11,21 50:18
Finance 129:7	frame 112:20 211:6 213:10	found 150:19 162:16 187:19	51:16 53:16 74:18	51:16 53:16 74:18
financed 133:8	fit 82:6	founded 55:21	81:7 82:22 83:1	81:7 82:22 83:1
financial 12:11,12 13:14 32:13 58:13 58:16 102:22,23 103:9 130:18,22 131:1 196:2,4 200:19 209:19,21	five 22:10 92:15 102:6 111:21 200:18	four 173:12	93:18 94:2 96:2	93:18 94:2 96:2
financially 6:7 218:13	fix 156:6 160:12 fixed 156:18 166:11	fourth 101:10	funds 35:1,6 37:12 43:14 61:20 66:6	114:17 115:3
	flat 180:12,13	frame 112:20 211:6 213:10	71:13 72:14 80:7 86:3,12 90:7 91:8 91:11,19,19	135:11,11 142:2
	flight 82:18	friends 94:12	91:11,19,19	155:22 157:22,24
	flip 153:1 197:21	friends' 94:16,18 94:20	funny 83:2	158:14 163:3
	float 84:24	front 8:2 64:15 86:22 94:2 107:6	Furman 72:4 75:11	170:19 174:8
	floated 137:11	172:17,18	furniture 53:6,10 53:19,21 54:1,2,6	177:10 184:1
			further 194:21 215:2	goal 165:12
			G	God 7:9
			G 48:9,12,14,15,19 49:5	goes 101:19 102:5
			Gambling 83:9	128:12 184:18
				going 8:12 10:4,19
				13:17 23:16 28:18
				29:2,16 35:23
				50:14 53:19 54:11

55:10 57:2 58:1 65:12,14 72:18 83:1 86:16,18,19 86:21 88:7 89:4 89:15 91:20 93:10 93:12,13 94:2,5 95:22 96:7,21 98:6,15 106:2 110:20 113:21 120:17 121:25 125:21 127:25 129:19 136:22 150:7 171:23 180:11 194:1 202:17 210:2 214:15,21 215:16 216:6 <b>good</b> 6:4 7:18,19 74:7 83:11 95:24 96:2 126:9 143:19 151:15,17,17 212:25 <b>goods</b> 31:3 32:20 32:24 34:11 43:6 55:9 56:25 60:24 63:23 64:7 65:9 <b>government</b> 112:5 119:6 126:20 131:8 137:19 <b>graciously</b> 126:6 <b>Graybox</b> 1:8 2:8 6:15 81:8 <b>great</b> 18:5 45:12,12 151:20 <b>groceries</b> 135:12 <b>gross</b> 177:1,11 184:5 185:5,5 189:8 <b>group</b> 27:22 30:20 33:24 35:16 61:16 76:25 80:14 83:4 97:10 112:12 113:14 119:11 126:23 127:9 131:13 132:21 <b>guess</b> 17:24 99:15 125:21 164:24	200:20 <b>guessing</b> 117:3 125:25 <b>Gunning</b> 109:7 <b>guy</b> 25:17 43:9 45:12 69:2,4,4 110:12 121:1 124:6,15 144:2 149:20,21 157:14 208:16 <b>guys</b> 24:15 42:20 43:2,7 55:25 68:12 69:7 74:9 96:1 124:1 143:18 143:22 149:20 151:6,18 159:7,8 161:20 162:16 185:21 186:23 187:19,20 195:9 197:9 202:22 208:1	157:12,20,23,24 161:16 166:17 179:1 185:1 186:18 187:6,12 191:19 192:18,23 <b>heard</b> 201:7 208:7 <b>heavy</b> 95:11 <b>held</b> 71:4 <b>help</b> 7:9 85:18 126:7 135:5 142:7 195:23 <b>helped</b> 85:15,16 <b>helpful</b> 188:7 <b>helping</b> 61:6 70:24 110:14 162:2,23 <b>hereto</b> 8:6 10:8 38:2 44:15 48:3 66:21 71:22 76:2 79:14 83:15 87:13 89:19 96:25 112:1 119:2 126:17 131:6 137:16 138:25 152:22 172:9 197:18 218:18 <b>Hey</b> 67:3 72:2 87:18 <b>high</b> 93:25 <b>highest</b> 51:4 <b>hand</b> 7:5 <b>handle</b> 10:21 147:6 <b>handled</b> 124:14 <b>handling</b> 157:8 <b>happened</b> 95:13 117:18 <b>happening</b> 117:21 <b>hard</b> 154:12 205:6 <b>Harry</b> 154:19,19 154:21,22 <b>head</b> 22:20 195:6 <b>headed</b> 49:15 <b>health</b> 70:5,6 72:5 81:16 114:21 118:6,17 146:11 146:18 147:5 149:24 152:10,13 155:14,24 156:24	100:10 102:10,13 102:14,20 107:3 107:19,20 108:3 108:17,23 109:1 121:2,5,14,25 122:15 136:5,6,7 136:9,10 <b>housed</b> 31:16 <b>Huh-uh</b> 156:5 <b>hundred</b> 83:11	<b>I</b> <b>I-N-D-E-X</b> 4:1 <b>IA</b> 26:4 27:12 34:13,15,15 36:22 38:5,6 46:5,15,19 47:2 50:16 58:3,4 68:8 69:11,17 71:8 84:5 86:18 88:22 89:25 90:4 93:12,13 118:4,5 118:22 125:24,24 141:16 146:9,11 146:15,15 147:25 148:2,13 153:13 164:6,8,17,18,23 165:14 167:10 181:18,23 197:9 205:18 207:4 <b>IA's</b> 72:20,23 <b>idea</b> 54:7,9 57:19 60:19 61:21 78:14 111:10,20 130:24 132:9 143:18 151:15,17 157:5 159:3 162:17 187:18 194:18 213:12 215:19 <b>identification</b> 8:5 10:7 38:1 44:14 48:2 66:20 71:21 76:1 79:13 83:14 87:12 89:18 96:24 111:25 119:1 126:16 131:5 137:15 138:24 152:21 172:8	197:17 <b>identified</b> 17:15 77:18 151:25 155:17 157:10,11 177:2 <b>identifies</b> 18:6 176:2 <b>identify</b> 57:5 62:18 62:23 161:14 <b>Illuminer</b> 195:7,14 198:4,5 206:21,23 207:2,2,6,18 208:2,4,19 <b>imagine</b> 146:24 176:8 202:5 205:3 207:21 <b>immediately</b> 46:6 <b>inaccuracy</b> 194:15 <b>inactive</b> 21:20 <b>include</b> 106:21 182:8 207:20 <b>included</b> 72:25 73:2 140:1,4 <b>includes</b> 104:13 <b>including</b> 12:17 31:9 72:4 98:23 114:8,21 142:20 158:23 <b>income</b> 35:4 58:21 58:22,25 59:1 <b>incoming</b> 84:23 <b>Incorporation</b> 15:8 <b>incorporator</b> 17:12 17:18 <b>incorrect</b> 146:10 <b>increase</b> 67:4,12,18 67:23 68:1,16 <b>increased</b> 67:24 68:3 <b>indicated</b> 217:7 <b>indicates</b> 206:23 <b>indicating</b> 82:5,8 111:5 <b>indication</b> 105:16 106:3 166:21 <b>individual</b> 7:20 15:17,21 17:15
--	--	--	--	---	--

31:1	<b>insurances</b> 107:25	118:19 119:11,16	168:25 169:17	208:22 209:6
<b>individual's</b> 177:11	133:7,12,14	120:2,10,18,24	170:6	210:9 211:18
<b>individually</b> 93:17	192:23 200:18	125:11 126:23	<b>interest</b> 117:24	212:5,8,11,14
119:19 213:5	<b>integrated</b> 1:8 2:8	127:9,21 128:1,5	144:25 152:4	<b>invoices</b> 5:12 33:9
<b>individuals</b> 9:22	4:9,11 5:12 7:25	129:14 130:1	<b>interested</b> 6:7	153:5,16 154:4,13
70:12 98:22 102:6	8:9 9:15,21 10:15	131:13,23 132:21	218:13	167:2,7 198:1,2
140:6 149:23	10:18 11:15 12:4	133:17 136:19,23	<b>interesting</b> 150:25	204:19 205:7
150:12 151:25	12:9,13,24 15:8	136:24 137:4,7,9	<b>interests</b> 196:16	210:23 211:4,12
158:23 180:6	15:25 16:13,20	137:10 138:1,4,8	<b>intermittently</b>	212:3
<b>industry</b> 143:6	17:12 18:7,11,25	138:12,16 139:6,7	116:3,16	<b>involved</b> 34:16
150:23 151:9	19:4,10,18 20:7	139:15,24 140:16	<b>internal</b> 187:1,21	49:22 92:10,12
152:5 159:14	20:18,22 21:15	140:18,24 141:3,7	<b>internally</b> 66:12	151:9,10,12,13
<b>information</b> 5:19	23:24 24:17 25:1	141:8,12,24	<b>Internet</b> 81:17	152:4 167:16
10:24 13:24 14:24	25:11,14,18 26:2	142:13 145:11,19	133:24 134:11,16	195:10 208:10,14
35:3 177:19,20	26:22 27:6 28:10	146:17 148:3	135:21,24 144:16	208:15
182:8 183:9	29:6,20 30:19,24	153:5 155:23	<b>Interrogatory</b>	<b>involvement</b>
185:10 186:14	31:2,4,11 32:4,8	156:22 157:1,14	215:12	143:15 149:17
189:5 190:3,5	32:20 33:6,13,24	157:16 158:24	<b>interrupt</b> 154:15	<b>involves</b> 92:18
193:3	34:11 35:17,20	160:19,23 161:11	<b>interviewed</b> 150:19	<b>involving</b> 109:20
<b>initial</b> 15:16 105:21	37:7 38:15,21	161:16 163:10,11	<b>introduce</b> 6:21	<b>IP</b> 27:17,21,22,23
<b>initially</b> 16:1	39:9,14 40:4,12	163:16 164:3	<b>introduced</b> 97:4	28:3,4,12 30:20
<b>inputting</b> 177:18	40:21 41:1 43:15	165:5,7,15 166:16	112:4 119:4,6	30:23 31:3,9,13
<b>instance</b> 37:8 90:23	43:20 45:21 50:10	167:2,6,21 168:10	131:9 137:18	31:21,23,25 32:21
91:7,10,18 194:10	50:15 53:1 54:25	169:7,14,22 170:3	150:17,20	33:8,13,14,23
<b>instances</b> 37:17	55:8 56:12,24	170:11,21 171:6	<b>invested</b> 94:7,11,12	34:12 35:16,20
115:3 213:3	57:16 58:7,9,11	177:8 179:25	94:21 95:2,3	38:21 39:8 40:3
<b>instruct</b> 42:20	59:8 60:15,25	180:2,8 182:11	<b>investigations</b>	40:12,22 41:1
<b>instructed</b> 5:16	61:17 62:3,14,19	183:18 189:22,25	23:15	43:6,8,24 54:25
23:18 37:16	62:23 63:16,24	190:10,21,22	<b>investment</b> 42:11	55:9,20 56:12
<b>instructing</b> 130:11	64:7 65:5,10	195:13,19 197:2	<b>investments</b> 42:17	57:1,16 59:17
<b>instruction</b> 140:5	67:11 68:6,18	197:11 198:3,25	42:23	60:2,8,15 61:1,3,4
<b>instructions</b> 8:22	69:1,25 70:2,4,9	199:14,21,23	<b>investor</b> 95:22	61:16,25 62:6,9
131:2 141:22	70:11,13,20 76:8	200:3,9,9 201:15	<b>invoice</b> 33:7 103:15	62:15,20,24 63:2
204:10 205:3	76:12,25 77:6	201:19,24 202:2	154:16 155:5	63:16,25 64:7,18
207:4 208:18	79:22 80:1,9	203:10 205:11	156:21 158:22	65:4,10 66:7
<b>instrumental</b> 28:8	83:24 84:14 85:8	206:15,20,24	160:22 161:1,4,11	76:25 77:5 78:2
<b>insurance</b> 43:3	85:10,20 86:13	207:1,5,14,19	163:5 165:25	80:9,14 90:15,21
50:2 52:16 70:6	88:7,14 90:16,20	208:12,20 209:7	166:2,15 167:20	90:25 91:19,25
72:5 81:17,17	90:24 97:13,17	209:18,25 210:3,5	167:25 168:10	95:6,20 97:10
104:16,19,19	98:6,15,22 99:7	210:10,21 211:11	169:6,13,21 170:2	98:4 105:22
107:14,15,17,23	99:21,23 100:16	211:18 212:2	170:11,19,20	112:12 113:4,14
107:25 108:2,7	101:18,24 105:3	213:5,20,24	171:6,11 198:25	119:11,15 120:1
114:21,22 118:6	105:22 112:12,20	<b>Integrated's</b>	199:15 201:12,24	120:10 126:23
133:10,11,15,17	113:15,20,24	207:12	203:4,10,20,24	127:9,20 131:13
147:5 157:22,23	114:5 115:6,11,22	<b>Integration</b> 38:8	204:6,13,15,17,18	132:4,8,21 138:9
157:23,25 162:25	116:2,9,15 117:11	<b>inter-company</b>	205:17,22,25	138:13,17 149:8
192:23	117:11,16 118:10	155:6 166:7	206:9,20 207:7	149:11,13,14

159:18 160:2,6,10 182:9 183:19 <b>IP's</b> 28:5 78:9 <b>iPhone</b> 128:22 134:4,4,5 <b>issued</b> 16:16 33:7,9 206:1 <b>issues</b> 57:6 <b>item</b> 184:18	<b>June</b> 63:15 170:20 171:19 <b>JWALKER@C...</b> 3:5	<b>Kiarash</b> 1:16 2:16 3:12 4:3 5:11 99:11,13,14,23 100:20 104:24 <b>kind</b> 22:5 48:25 49:2 71:2 83:7 92:21 113:6 153:21 154:7 157:4 168:22 158:13 173:25 <b>kjammedia.com</b> 85:3 <b>KJM</b> 46:6,9 47:7 <b>knew</b> 21:7 27:12 159:14,15 <b>know</b> 8:11 9:6 10:10 14:12,17,18 103:7,11,20,21 104:10,25 105:10 105:11,17,17 106:1,17,19 107:11 108:25 109:2 110:20 113:25 114:6,7,20 114:23 115:3 116:10 118:21 120:14,15,19,24 121:5,14,24 124:5 125:3 128:2,6,13 133:1 137:6,8,11 139:6 213:21,22 <b>keep</b> 23:18 34:24 48:22 72:17 129:19 148:11 202:17 204:19,21 204:23 205:6 207:13 210:1,2 <b>kept</b> 23:14 154:10 177:15 <b>Kia</b> 6:18 76:7 99:12 115:7,12,15,20 117:7,11,15 118:18 125:10,12 125:19,23 128:10 129:15 136:19,24 137:3 145:9 176:12 216:6	95:19,23,25 96:16 99:11,13,14,23 100:20 104:24 105:1 106:11,11 106:22 107:1,4,9 107:13,24,25 108:4,8,10,11 111:22 113:3 114:5,21,25,25 115:11 116:7,8 120:23 122:8 124:5 125:3,18 128:5 129:9,11 130:6,23 132:7,10 132:13,14,16 133:12,15 135:8 135:19,20,21 136:3,5,11,17 138:8,12,20,21 139:19 140:13 144:21 145:5 146:9,13 148:9,18 148:19,23 149:4,5 149:7,14,19 150:20,21,24 151:2 152:2,2,16 153:2,9,11,11,17 153:20,21,22 154:4,10,11,12,14 154:14,20 155:9 157:3,8 158:19 159:1,5,12,23 160:1,2,16,22,24 162:2,2,11,15,19 162:25 163:1,4,21 164:14 166:8,9,24 167:1,5,10,13 168:7 169:3,19 171:3 172:11,14 172:22 174:4 175:3,6,8,13,19 175:22 177:9 180:25 181:1,8 183:2,8 185:16,21 185:24 186:21,22 187:4,5,11,13,19 188:2,6,7,22,23	189:17 191:18 192:2 193:22,23 194:16 195:5,7,11 195:13,16,25 196:6,7,11,14,17 197:2,7,8 199:5,6 199:9,11 200:16 201:15,23 202:2,4 202:8,12 203:18 205:14,15 206:2,3 206:9,11,14,16 207:18 208:7,8,15 208:19 211:2,11 212:2,14,25 213:16 <b>knowledge</b> 26:16 <b>known</b> 27:6,9 196:20 <b>Kransberg</b> 161:19 <b>Kransenberg</b> 161:18 <b>Kranzdorf</b> 161:19 161:23,25 162:13 164:8 178:14 185:19 186:2 189:9 190:20 191:5 195:18 207:10,22	<b>L</b> <b>L.A</b> 106:2,6 <b>landlord</b> 123:6 <b>landscaping</b> 50:3 51:24 52:2 <b>language</b> 188:19 <b>Larry</b> 149:20,21,24 150:1,6 <b>Larry-something</b> 149:22 <b>Las</b> 82:22 83:6 <b>late</b> 134:4 <b>Latzer</b> 3:8 4:5 6:20 6:23,23 7:17 8:7 10:9 28:22 29:1 38:3 44:16 48:4 54:10,16 66:22 71:23 76:3 79:15
--	--	--	---	---	--

83:16 87:14 89:20 93:21 96:5,12 97:1 112:2 119:3 126:18 131:7 137:17 139:1 152:23 171:22 172:3,10 187:15 197:19 202:13,18 202:23 214:19 215:1 216:3 <b>law</b> 3:13 5:14 72:5 75:11 103:25 104:1,4 162:8 198:8,12 201:18 201:24 <b>laws</b> 218:20 <b>lawsuit</b> 188:1,9,11 194:17 <b>lawsuits</b> 173:25 <b>lawyer</b> 11:19 109:8 164:10 198:21,23 199:17 201:6 <b>lawyers</b> 195:2 <b>learn</b> 150:16 <b>lease</b> 50:17,18,20 114:9 148:19 158:1,4,6 162:24 192:23 213:21 <b>leased</b> 74:3 213:20 213:22 <b>leasing</b> 75:5 146:11 146:13 <b>leave</b> 46:5 53:5 <b>ledger</b> 183:16 <b>ledgers</b> 59:13 60:10 <b>Lee</b> 102:19,21 103:14,20 195:25 196:1 207:9,22,24 207:25 209:18 210:10,21 211:4 <b>left</b> 11:22 137:21 155:12 175:24 186:24 <b>legal</b> 21:2,4,5 104:8 157:6 163:22 165:1 185:22 186:2 191:6	195:16 197:7 200:4,21 201:19 207:7,22 <b>let's</b> 9:15 13:16 26:18 30:4 33:17 35:9 39:2,18 46:17 47:25 49:7 54:10,23 56:9 57:13 60:13 61:13 65:3 66:15 71:19 66:15 71:19 75:24 76:18 78:17 79:11 80:3 83:12 87:9 89:16 90:9 90:11 101:17 102:4 105:10 106:1 111:23 113:19 118:24 119:21 121:4 126:13 127:4,16 131:3,17 132:25 137:13 138:22 140:9 152:24 154:16 155:4,11 156:3 160:25 165:25 167:24 168:15,23 171:10 171:14 172:12 175:13 182:1 183:24 189:2 198:7 211:14 <b>letter</b> 5:14 203:14 203:14 205:16,23 <b>level</b> 51:5 147:6 <b>libraries</b> 75:1 197:8 <b>library</b> 73:25 159:23 197:7 201:8 <b>license</b> 44:25 45:4 162:7 <b>licensing</b> 92:18 <b>life</b> 212:23 <b>lifting</b> 95:11 <b>light</b> 215:7 <b>lightbulb</b> 195:10 <b>lightbulbs</b> 208:11 <b>lights</b> 93:5 <b>line</b> 45:19 48:8 49:7 53:4 78:17 82:17	156:6 203:14 209:9 <b>list</b> 4:12 9:4 38:5 102:6 133:4 174:6 183:14 <b>listed</b> 9:1 12:1 15:17 58:17 137:25 156:20 158:12 185:19 189:13,18 <b>litigation</b> 23:16 56:3 <b>little</b> 53:17 83:10 95:25 96:15 126:12 138:19 148:8 180:5 <b>lived</b> 69:7 <b>lives</b> 196:14 <b>LLC</b> 1:8 2:8 6:15 145:6 199:1,7 202:3,9 <b>loan</b> 50:4 52:9,11 52:23 79:9 95:12 99:20 100:1,2,4 116:7 117:14,15 118:3,5,13 121:9 121:17 122:1 126:3 148:2,22 213:9,13 <b>loaned</b> 118:22 125:21,23 126:2 148:4 213:4,4 <b>loaning</b> 148:17 <b>loans</b> 52:13 70:5 100:9 148:6 213:12,15,16 <b>located</b> 73:18 214:6 <b>log</b> 41:4 <b>logged</b> 32:17 <b>long</b> 114:12 122:19 122:24 136:11,12 136:16 151:3 163:24 196:20 <b>longer</b> 24:7,14,15 164:6 <b>look</b> 8:20 9:7 10:11 26:18 29:17 30:4	39:2,6,18,25 40:23 47:25 49:7 49:8 54:23 56:9 57:13 60:13 61:13 65:3 66:15 71:19 75:24 76:18 78:17 79:11 80:3 83:12 87:9 89:16 90:9 90:11 101:17 102:4 105:10 106:1 111:23 113:19 118:24 119:21 121:4 126:13 127:4,16 131:3,17 132:25 137:13 138:22 140:9 152:24 154:16 155:4,11 156:3 160:25 165:25 167:24 168:15,23 171:10 171:14 172:12 175:13 182:1 183:24 189:2 198:7 211:14 <b>looked</b> 43:1 76:24 127:2 130:9 172:25 200:12 <b>looking</b> 49:13,14 72:3 106:25 140:10 172:19 199:20 200:5 <b>loaned</b> 118:22 125:21,23 126:2 148:4 213:4,4 <b>loaning</b> 148:17 <b>loans</b> 52:13 70:5 100:9 148:6 213:12,15,16 <b>located</b> 73:18 214:6 <b>log</b> 41:4 <b>logged</b> 32:17 <b>long</b> 114:12 122:19 122:24 136:11,12 136:16 151:3 163:24 196:20 <b>longer</b> 24:7,14,15 164:6 <b>look</b> 8:20 9:7 10:11 26:18 29:17 30:4	196:2 <b>M</b> <b>Madame</b> 92:23 <b>magnate</b> 196:15 <b>mail</b> 14:25 15:2 69:6 <b>MAIN</b> 3:4,9 <b>Majid</b> 16:5,8 23:19 28:20 30:10,12 35:4 45:3 52:14 58:22,23 60:6 83:1 177:13,16 178:16 183:13,16 190:5 204:14,21 205:5,12 215:9 <b>Majid's</b> 181:6 <b>major</b> 199:19 <b>making</b> 67:14 70:2 70:23 84:14 116:1 128:6 142:2 174:4 179:23 <b>Malibu</b> 132:4,10,12 132:15 <b>man</b> 126:9 <b>manager</b> 45:7 85:17 <b>March</b> 1:18 2:19 4:17,18 6:1,10 30:2,2 36:14 54:23 56:11 57:15 60:14 76:4,24 79:17 80:6 126:24 127:10 131:20 132:21 154:17 161:5,5 <b>mark</b> 82:19 <b>marked</b> 8:3,4 10:4 10:6 22:22 28:19 37:23,25 39:3,11 39:23 40:15 44:13 47:25 48:1 54:18 66:15,19 71:20 75:25 76:19 79:12 83:13 87:11 89:17 96:23 111:24 118:25 126:15
--	---	---	--	---

				<b>N</b>
131:4 137:14	196:16 213:21,22	19:18 20:1,6	159:11,16,17,24	<b>N</b>
138:23 152:20	<b>Media's</b> 50:18	128:23 202:16	159:24 160:5,6,8	<b>N 5:1</b>
172:7 197:16	74:13 114:7	<b>Miramax</b> 159:21	160:9 165:8,10	<b>name</b> 6:5,14 12:1
<b>marketing</b> 207:9	<b>medical</b> 31:17,17	196:23,24 198:21	168:22 174:15	12:20 15:15 18:24
207:24	31:24 43:1 50:2	198:22 201:4,6	176:13 180:11,22	50:18 62:19 74:2
<b>marking</b> 96:21	52:16 143:6 144:4	<b>misspelled</b> 168:4	181:3,9 182:21	74:13 77:18 92:3
172:4	144:11 145:25	170:24	183:3,3 199:24	98:17 102:19
<b>material</b> 207:9,25	147:21,22 149:12	<b>mistake</b> 210:24	213:4,9,13	104:1 110:18,24
<b>matter</b> 27:17	150:23 151:2,12	211:1	<b>Monica</b> 2:17 6:12	111:16 114:8
109:20 110:8,9,11	151:23 152:4,7	<b>Mitchell</b> 1:21 2:19	<b>monies</b> 38:21 40:18	123:5 132:12
185:17 193:12	159:14 161:24	7:2 218:1,24	45:1 56:12 58:2,7	144:2 152:12
<b>Matters</b> 203:15	<b>meeting</b> 18:25	<b>model</b> 103:9	58:19 59:16 63:19	191:15 208:8
<b>mean</b> 24:10 41:7	19:10,18,18 20:1	<b>modeling</b> 196:4	69:13,17 76:12,16	<b>named</b> 49:15
45:17 48:12 68:9	20:7	209:22	77:5,8 80:13 89:3	198:13
70:14,22 115:18	<b>member</b> 45:6 51:5	<b>models</b> 102:23	89:8 90:20,24	<b>Names</b> 12:16
135:10 142:12	162:9	<b>moment</b> 215:24	95:2,20 113:4	<b>narrow</b> 29:12
148:16 153:12	<b>memory</b> 48:23	<b>Monday</b> 67:5 86:8	138:13 139:21	<b>National</b> 130:18,22
164:14 167:3	<b>memos</b> 195:22	<b>money</b> 5:5,6,7,8,9	141:13,22 148:6	130:25
180:23 202:15	<b>mention</b> 176:16	28:2 32:16,17	165:17 167:6	<b>nature</b> 24:5,10
213:2	<b>mentioned</b> 88:4	34:16,17,19 35:20	201:16	25:11 109:18
<b>meaning</b> 23:6	158:10 161:18	36:5 42:21 45:18	<b>month</b> 116:21	110:11 124:12
82:11	179:10 188:25	50:12 51:16 52:11	123:8,19 156:20	198:19 199:10
<b>means</b> 81:20	196:2	52:13,25 58:5	<b>monthly</b> 105:8	<b>necessarily</b> 25:9
146:13,14 155:9	<b>Merchants</b> 77:13	59:2 60:8 64:18	60:8	60:8
168:7	<b>Merrill</b> 105:6	68:22 69:10,23	<b>necessary</b> 17:2,5	200:18
<b>meant</b> 42:3,6 48:18	<b>messes</b> 212:23	71:12 72:12,14	<b>need</b> 24:13 28:21	200:18
49:5,11 81:12	<b>met</b> 49:16 52:17	78:2,9 81:12 82:6	47:7,8 50:1 80:17	47:7,8 50:1 80:17
90:3	<b>Michael</b> 198:13	82:7,12 86:17	87:20 91:4 96:17	87:20 91:4 96:17
<b>media</b> 18:6,10,13	199:17 201:5	91:16 94:7,11	147:4 148:18	147:4 148:18
18:17 20:14,21	<b>middle</b> 129:13	95:3 99:21 100:5	151:19 174:13	151:19 174:13
46:9,15 50:16,19	<b>Migler</b> 3:13 6:25	100:6,6,8 103:16	175:14 192:9	175:14 192:9
53:2 71:4,6,7,14	6:25 28:24 93:9	105:21 114:12,13	195:3	195:3
74:4 75:4 84:9,15	93:18 187:14	114:15,16,17	<b>needed</b> 11:13 14:24	<b>needed</b> 11:13 14:24
85:6,12,13,14	202:11 215:4,22	116:10,18 117:19	19:21 32:14 36:5	19:21 32:14 36:5
88:21 101:19,24	215:25	117:22 118:3,4,5	37:11 43:10 50:12	37:11 43:10 50:12
102:2,5 103:7,11	<b>miles</b> 135:7	118:5,5,12,13,16	52:12,15,25 71:1	52:12,15,25 71:1
103:20,21 104:10	<b>Millano</b> 193:15	118:22 121:17,18	72:16,16 73:4	72:16,16 73:4
104:25 105:11,17	<b>million</b> 27:18 28:11	121:25 125:21,22	<b>multiple</b> 124:16	74:12 89:10 100:7
109:2 110:20	28:15 138:19	125:24,24 126:2	127:25 136:3	118:4,5,11 121:17
113:25 114:6,20	176:17 189:1	126:12 137:6,11	207:16	124:18,20,21
114:23 115:4	<b>mind</b> 72:17	137:12 140:5	<b>multitude</b> 31:9	125:22 140:13
120:15,19,24	<b>mine</b> 49:16 82:14	141:16,17,18	84:19 164:21	142:8 157:17,21
121:24 124:5	118:2	142:2,19,24	165:4 210:5	157:22,23 158:2
125:3 128:2,6,10	<b>minuscule</b> 193:11	147:17,23,24	<b>Museum</b> 92:23	159:11 163:2
128:13 133:1	<b>minute</b> 9:7 10:11	148:4,9,11,16,17	<b>musicals</b> 92:19	164:12 165:2
136:19,25 137:3,6	38:24 197:21	148:18,25 151:5		
137:8 145:9 196:7	<b>minutes</b> 18:24	151:18 157:16,16		

174:11 187:9 188:3,3,21 192:22 192:24 195:23 214:3 <b>needs</b> 32:14 51:16 124:19 215:2 <b>negotiate</b> 158:6 <b>negotiated</b> 158:1,4 <b>neighborhood</b> 22:15,18 173:13 <b>never</b> 146:7 167:11 168:22 174:3 194:10 <b>new</b> 3:10 93:25 119:19 162:8 200:4 <b>north</b> 3:9 28:15 <b>Nos</b> 215:13 <b>notary</b> 6:5 <b>notation</b> 184:12 <b>note</b> 28:3 <b>notice</b> 2:20 4:9 8:8 19:9 20:1 189:12 <b>notify</b> 59:19 <b>November</b> 4:13,14 4:15 32:9 33:19 44:17 48:5 67:1 99:25 100:17 103:18 169:13 209:13 210:11,16 <b>number</b> 4:8 5:4 49:17 52:14 68:13 75:17 113:20 123:19,20 143:1 165:9 176:24 178:4,8,8 180:13 181:1,7,12,13,15 182:2 185:3,18 186:2,19 187:17 190:16,16 191:3 191:23 193:11 196:17 198:15 205:1 <b>numbered</b> 15:5 38:10 119:6 189:3 193:1 203:2 206:18	<b>numbers</b> 13:20 29:16 38:24 92:18 93:1 179:12 180:3 185:25 <b>O</b> <b>O</b> 49:8,11,12 <b>o'clock</b> 202:11 <b>oo---</b> 216:10 <b>oaths</b> 218:3 <b>object</b> 93:10,13 151:13 <b>obtain</b> 74:11 <b>obtained</b> 110:17 <b>obviously</b> 72:13 176:13 <b>occasions</b> 49:17 82:25 83:3 103:4 126:4,5 147:20 148:1,13 167:9 <b>October</b> 168:24 209:12 210:16 <b>Oedecker</b> 49:15 <b>offered</b> 174:22 192:19 <b>offering</b> 177:8 <b>office</b> 3:13 43:9 50:21 53:11,14,14 53:15,20,21 54:3 69:2,3,10 70:10 70:23,23 73:5,11 73:11,12 85:17,17 106:11,12,13 107:22,24 114:8 114:22 121:2 122:9,11 123:2,5 123:6,11,17 124:25 125:4,5,5 125:7,9 129:7 133:23,24 134:10 134:12 135:6,9,13 144:15 146:2 147:5,6 153:21 154:7,23,24 155:2 155:20,24,25 157:6,7 158:1,5,7 158:8,9,11,15,20	192:22 215:20 <b>officed</b> 106:13 <b>officer</b> 11:23 12:4 12:11,13 13:8,14 42:14 43:8 47:17 58:11,13,14,15,16 69:3 71:4 144:17 145:2 154:25 <b>officers</b> 12:17 20:23 144:22 <b>official</b> 152:12 180:20,23 <b>officially</b> 25:25 85:19 <b>Oh</b> 8:16 24:25 153:11 194:8 195:3 206:7 <b>okay</b> 8:2,12,21,21 8:23 9:4,7,9,9,10 9:15,20,25 10:12 10:17,23 11:2,5 11:10,14,19,22 12:1,20,23 13:5 14:1,15,21,23 15:4,11,21,23 16:3,6,9,11,19,24 17:1,4,9,9,10,13 17:25 18:2,5,13 18:16,21 19:3,8 19:17,21,25 20:4 20:13,17,21,25 21:5,9,12,15,19 21:22 22:3,8,12 22:14,19,25 23:2 23:10,20 24:10,16 24:21 26:5,7,15 26:18,22 27:1,12 27:15,21,24 28:2 28:10,18,21 29:8 29:12,18,25 30:3 30:4,5,9,11,13,15 30:17 31:2,11,23 32:4,7 33:4,6,11 33:17,18 34:2,6 34:22 35:9,10,14 35:19,25 36:8,11 36:12,18,24 37:6	37:17,20,23 38:8 38:12,15 39:2,7 39:18,22,25 40:8 40:14,17,25 41:6 41:11,16,18,21 42:1,5,8,14,22 43:5,13,23 44:4 44:22 45:5,11,17 45:19,25 46:4,9 46:13,17,24 47:4 47:6,14,17,20,23 48:12,21 49:7,18 49:22 50:14 51:1 51:7,10,14 52:9 52:18 53:4,22,25 54:6,8,10,17,21 54:23 55:3,6,12 56:6,9,18,24 57:3 57:14,19,22 58:9 58:18 59:3,7 59:15,20,25 60:12 60:13,23 61:8,13 61:14,20,22 62:5 62:18,22 63:2,6 63:19,23 64:3,21 64:19,22 65:8,15 65:14,20 66:13 66:18,22 67:8,17 67:14,19,22 68:4 68:21,25 69:12,20 69:11,19 70:13,23 70:14,17 71:2,11 71:14,17 72:8,22 72:18,22 73:2,11,20 73:3,18,20 74:2,5 74:8,15,18 75:4,7 75:10,19,21 76:14 76:18,20,22 77:4 77:8,11,18,23 78:1,13,17,22 79:2,8,20 80:3,5 80:16 81:1,2,6 82:13,17 83:12,20 83:23 84:1,3,8,17 84:21 85:2,5,9,14 85:19,22 86:6,11 86:23 87:2,5,23 88:6,25 89:3,8,16 89:18,22 90:12,17 90:18,23 91:2,15 92:8,17 94:7,25 95:2,16 96:1,13	97:4,9,20,25 98:2 98:2,11,16,24 99:2,10,16,19,23 100:2,10,24 101:10,17 102:2,4 102:13,19,25 103:12,17,24 104:3,6,9,13,15 104:21 105:2,6,10 105:20 106:1,6,8 106:17 107:10,17 107:22 108:2,6,9 108:12,16,18,22 108:25 109:7,9,13 109:17 110:3,6,20 111:11,15,18,23 112:3,9,16 113:3 113:8,11,12,19,23 114:23 115:11 116:1,12,20 117:9 119:9,15,25 120:5 120:13,17,20 121:4,11,19 122:3 122:25 123:3,8,18,18 123:25 125:10,15 125:18 126:14 127:1,5,12,16,22 127:24 128:5 129:5,7,10,13 130:1,8,14,17 131:11,17,19,25 132:3,22 133:3,19 134:7,20 135:1,3 135:14 136:21 138:8,15 139:4,13 139:17,21 140:4 140:14 143:4,7,15 144:3,8,21,25 145:5,14,23 146:3 146:17 147:7,17 148:3,16 149:1 150:6,11 151:8,24 152:3,25 153:3,3 153:4,7,24 154:4 155:4,11 156:3,17 156:22 157:1,10 160:2,25 161:4,9
--	---	---	---	--

162:9 163:15	<b>open</b> 23:14 30:12	18:2,3,21 19:5,8	147:25 148:21	<b>patio</b> 53:6,10,11,14
164:8,13 166:1,3	113:6 118:11	19:15 20:4,11	151:3 157:18	53:15,17,18,20,25
166:6,15,20	<b>operating</b> 23:4,6	22:21 26:5 29:13	160:22 166:24	54:2,5
167:24 168:9,23	141:8 147:9,12,14	29:14,16 30:4,13	167:2,6,13 168:20	<b>pay</b> 9:17 23:17
169:6,11,12,21,25	147:16 152:15	33:17,17 35:9,12	168:21 178:11,12	25:19 50:13,14
170:1,5,11 171:6	165:23 173:15	36:11,13 38:6	180:17 181:6,9,10	52:19 61:23 78:2
171:14 172:14,21	174:11,17 193:7	39:6,18,25 40:8	201:15 204:6,11	78:18,22 79:3
173:4,17 174:19	<b>operation</b> 24:8	40:11 43:12,24	210:4 211:11	81:13,22,23,24
175:6,9,18,23	144:9,10 147:7	44:1 54:21,24	212:11,14	82:2 86:14,19
176:2,7,19 177:1	149:18 150:21	56:10,11 57:13,13	<b>Paper</b> 125:6	88:15,19 89:4,8
177:10,24 178:7	158:3	60:14 61:13 63:11	<b>paperwork</b> 33:15	89:10 91:3,20,23
178:24 179:3,13	<b>operational</b> 192:20	63:15 64:24 65:2	147:4 154:7	92:24 100:6
180:10,18 182:1	<b>operations</b> 148:12	76:21 80:3,6 84:4	158:14 195:21	106:18 108:25
182:24 183:6,9,17	<b>opportunity</b> 143:20	84:8 90:10,11,13	<b>paralegal</b> 163:23	109:2,5 114:13,20
183:21,24,25	151:17	97:9 98:1,10	<b>pardon</b> 188:19,19	118:14,18,22
184:8,21 185:3	<b>Orange</b> 77:19,24	112:11 113:8,12	213:1	123:20 128:8
186:14,24 187:11	78:3,10,15	113:13 119:9,21	<b>parenthesis</b> 156:10	133:8 142:20,22
189:2,8,12,24	<b>order</b> 49:25 147:4	120:6 126:22	160:13	148:2,19 157:17
190:2,9,20,24	170:16,19 174:10	127:4,6,16,19,20	<b>parenthetical</b>	165:14 168:11,22
191:15,18,21	183:11	129:13 131:12,18	46:18 166:12	192:21 199:25
192:2,25 193:9,13	<b>ostensibly</b> 166:16	132:3,17,19,20	<b>park</b> 70:7 81:25	200:17 201:10,19
193:17,22 194:13	<b>outside</b> 93:11	161:7 167:18	92:22 118:12	204:10,14 210:5
194:16,20 195:3	<b>outstanding</b> 50:2	170:15 172:17,18	123:21	<b>payback</b> 116:7
197:2,11,15,23,24	100:9	172:23 175:18,19	<b>parking</b> 50:3 52:17	117:15 122:1
198:2,5,5,6,16,19	<b>overhead</b> 10:21	176:22,25 177:25	70:6 72:5 81:24	<b>paycheck</b> 85:21
199:4,7 200:2,21	142:16 164:18	181:17 183:24	81:25 118:6,11	115:19,21,23
201:12,18,23	<b>owe</b> 126:12	184:9,20 189:2	121:1 123:14,16	116:9 121:24
203:1,3,10,18,24	<b>owed</b> 109:16	192:25 202:24	123:20	139:22,23 163:3
204:4,16 205:6,13	<b>owned</b> 18:11 64:15	206:4,17 209:2	<b>part</b> 9:19 11:12	<b>paychecks</b> 146:15
205:16,19,22	197:8 199:9	210:7 211:14	17:6 20:1 25:24	157:15 177:15
206:3,17,19,23	<b>owner</b> 18:16 47:20	<b>pages</b> 16:12 170:16	36:21 51:18 53:15	189:18
208:22,25 209:2,3	<b>owners</b> 196:24,25	172:19,24,25	69:19 79:3 82:14	<b>payed</b> 86:13
209:14,17,24	<b>ownership</b> 144:25	173:1,2 218:9	87:5 94:6 102:17	<b>paying</b> 78:23 92:23
210:7,8,12 211:4	<b>owning</b> 18:7	<b>Pagoda</b> 47:8,14	116:6,7 141:4,15	99:24 100:1
211:8,14,15,17,24	<b>owns</b> 199:8	<b>paid</b> 23:7 25:20	173:1 207:11	106:19 114:6
212:2,5,14 213:16	<hr/> <b>P</b> <hr/>	33:12 52:20 70:6	211:23 212:1	121:9,19,23 123:8
213:22 214:5,8,14	<b>P</b> 218:4,4,8,11,19	72:18 73:4 75:7	<b>part-time</b> 179:11	125:4 134:16
<b>once</b> 23:16 47:6	<b>p.m</b> 96:11 171:24	79:10 81:21 91:12	<b>particular</b> 23:10,11	135:1,3 137:4
126:4 133:8 188:4	172:2 214:22,25	94:13,25 100:7	29:2 30:6 64:3	<b>payment</b> 30:23
191:4 204:25	216:9	103:2,16 105:17	214:8	32:7,21 33:7,23
<b>ones</b> 44:1 56:2	<b>package</b> 162:25	106:3 109:16	<b>parties</b> 6:9 124:16	34:3,8,12 40:11
168:13 177:14	<b>page</b> 4:4,8 5:4 8:12	116:3,22 117:7	218:12	54:24 55:4,14
<b>ongoing</b> 49:20	8:15,17,24 9:1	118:17,22 120:18	<b>partner</b> 196:13	56:9,16,22 57:20
110:8,9 148:12	10:23 11:2,23	121:1,24,25	<b>party</b> 150:18	57:23 60:19 63:9
<b>online</b> 36:21 37:13	13:16 15:4,7 16:9	125:24,25 129:20	<b>PASEO</b> 3:14	63:25 64:8 65:11
47:7 124:22	16:19 17:4,9,11	135:7 137:6 142:3	<b>pass</b> 59:14	65:13,16 76:25
185:17		142:25 144:14,15	<b>passed</b> 59:10	78:6,14 79:25

84:15 86:20 97:16 97:20,23 98:9 99:6 101:11,12,14 101:23 106:8 107:10 108:13,18 108:20 109:14 113:14,24 114:3 115:7 116:4,5 119:10,10,15,22 120:1,8,9,23 122:4,7 124:24 125:15 126:23 127:20 128:2,13 129:1,10,15 130:2 130:18,24 131:22 132:3,7,20 133:1 133:9 134:20 136:19,23 169:22 170:12 171:7 206:12 208:13,19	<b>payments</b> 5:11 28:11 41:1 73:17 98:21 108:7 114:23 115:3 127:1 130:14 131:12 133:4 139:6 142:21,22 142:23	<b>payroll-related</b> 164:13	<b>personal</b> 21:1,12 51:8,9 78:11 79:4 79:5,6,6,10 80:21 99:17 102:17 106:18,20 109:5 114:24 115:4 116:8 121:15,20 121:23 128:24 129:1,5 136:7	<b>placeholders</b> 41:11 60:1	<b>possible</b> 215:14
		<b>PDF</b> 175:12	<b>places</b> 31:16	<b>Potensiano</b> 193:15	
		<b>penalty</b> 26:13 217:6 218:20	<b>plaintiff</b> 2:17 6:23 6:24 27:16	<b>potential</b> 23:15 196:6	
		<b>pending</b> 7:7	<b>plaintiff's</b> 131:25	<b>potentially</b> 31:9	
		<b>pens</b> 125:6	<b>Plaintiffs</b> 1:5 2:5 3:2,7	<b>power</b> 106:7,9,10 106:18 107:2	
		<b>people</b> 9:17 24:23 25:19,22 31:20	<b>plan</b> 49:13 143:19	<b>PowerPoint</b> 196:4 207:8,23	
		52:13 55:19 70:5	<b>plastic</b> 92:24	<b>PowerPoints</b>	
		70:8 81:25 92:24	<b>play</b> 83:10	102:23 209:22	
		118:12,16,17	<b>PLAZA</b> 3:9	<b>practice</b> 151:23 162:8	
		124:20 156:20	<b>please</b> 7:3,5 35:9 40:8 46:4 48:9	<b>prefer</b> 96:4	
		157:9 158:15,17	49:7 54:21 61:14	<b>prepare</b> 187:25 188:2	
		158:20 159:1	63:11 64:24 77:12	<b>prepared</b> 9:12 41:14	
		176:16 178:13	90:11 113:10	<b>preposterous</b> 194:5	
		179:10 180:1	127:16 132:18	<b>Present</b> 3:17	
		184:17 210:4	169:25 170:16	<b>presentations</b>	
		<b>percent</b> 126:5	191:24 202:19	196:5 207:8,23	
		176:10,15 178:4	<b>plenty</b> 68:23 100:8	<b>presenting</b> 206:6	
		178:12 179:4,6,9	<b>point</b> 13:7,10,13 14:13 24:8 42:1	<b>president</b> 55:21	
		179:14,17,18,22	54:8 57:22 59:16	<b>pretty</b> 95:24 105:4 173:2 177:21	
		180:4,20 181:1,14	95:24 103:8 126:1	<b>previous</b> 161:1,4 171:14 190:6	
		184:11,17,25	135:4 147:19,23	192:19	
		190:13,16 191:1	148:4,7 167:1,5	<b>previously</b> 28:19 127:2	
		<b>perform</b> 75:16,21	168:16 174:9	<b>primarily</b> 71:6	
		104:6,8 193:9,14	194:10 211:2	<b>primary</b> 25:17 198:23	
		<b>performed</b> 70:13	<b>pointed</b> 28:14	<b>principals</b> 150:3	
		75:17 93:1 104:11	<b>pointing</b> 72:15 97:12 113:23	<b>private</b> 53:16	
		109:11 110:6	116:8	<b>probably</b> 16:5 17:22 21:24 41:3	
		180:15 198:16	<b>points</b> 174:2	51:18,22 52:6	
		<b>performing</b> 69:25	<b>poker</b> 83:11	64:2 70:22 71:7	
		70:16,20 104:9	<b>policies</b> 104:16,19 133:10,16	<b>Poormand</b> 15:20	
		109:9 110:4	<b>portion</b> 192:21	73:11 81:21 82:24	
		139:24 141:7,12	<b>position</b> 26:1	83:4 90:5 99:13	
		141:24 189:15	144:19 148:3	103:15 114:9	
		<b>period</b> 23:3 29:22	176:20 215:21	116:25 125:5,23	
		104:13 139:18	<b>positions</b> 71:4	128:11 138:20	
		173:6 193:14	<b>possession</b> 41:24	146:23 147:4	
		209:12 210:24	55:23,24 100:19	173:11 177:13	
		218:18	59:23 60:7		
		<b>Periodic</b> 5:11 139:5			
		<b>perjury</b> 26:13			
		217:6 218:20			
		<b>person</b> 17:23			
		165:17,17			

182:13,20 183:13	67:22 74:11	<b>pull</b> 214:3	34:22,25 93:10,16	134:1 135:3 137:5
183:15,15 185:12	150:22 173:22	<b>pulled</b> 181:13	96:16,17 153:14	144:19 145:8,13
195:15 199:16,24	182:8 201:23	190:17	192:3 215:3,4	153:25 154:1
200:1,16,19	<b>prompting</b> 150:11	<b>purchase</b> 28:4	<hr/>	161:6 193:21,24
202:13 207:9,21	<b>pronouncing</b> 15:18	53:10 78:9 199:18	<b>R</b>	194:1,20,22
207:24 213:1	<b>proper</b> 58:23	201:5	<b>R</b> 218:4,8,11,19	203:20,25 204:1
<b>problem</b> 13:22	<b>properly</b> 35:5	<b>purchased</b> 54:4	<b>raise</b> 7:5 157:16	208:22 211:5
28:24 29:18 30:5	70:24	200:7	159:11 160:6	212:5 214:12
127:18	<b>property</b> 132:15	<b>purchasing</b> 132:14	<b>raised</b> 159:17,24,24	<b>receipt</b> 77:11
<b>Proc</b> 218:7,11,14	<b>provide</b> 85:14	200:13	160:5	<b>receive</b> 71:3,5
<b>proceed</b> 7:2	140:8 149:11	<b>purported</b> 169:8	<b>raising</b> 159:16	95:20 138:16
<b>proceedings</b> 216:8	162:20 163:2,11	169:23 170:13	<b>ran</b> 70:23	139:21 141:13
218:5,10,15	191:21 197:11	171:8	<b>raw</b> 177:20	<b>received</b> 28:11
<b>process</b> 11:20	209:18	<b>purports</b> 161:10	<b>Ray</b> 44:18 67:4	40:21 59:16 113:4
15:16,25 16:4	<b>provided</b> 9:21 31:3	203:4	<b>read</b> 12:18 46:7,22	116:15 138:5,9,13
21:10 96:14	32:21 34:11 43:5	<b>purpose</b> 33:12	47:12 48:10 50:7	139:14,18,23
<b>produce</b> 175:11	55:9 56:25 60:25	55:13 57:20,23	67:6 72:6 77:16	147:17 180:14
<b>produced</b> 38:9	63:24 64:7 65:10	63:20 65:13,15	81:4,9 84:6 86:9	183:18 184:22
41:16,22 56:3	84:17 92:6 94:21	66:3,11 73:20	87:21 205:20	190:10,20
57:8 153:8,9	94:23 103:14,21	83:6 120:23 183:4	217:5	<b>receiving</b> 32:10
175:12 206:5	114:17 124:13,15	<b>purposes</b> 15:12	<b>reading</b> 48:22	68:5,18 90:24
215:13	142:15 144:13	41:1 61:22 174:16	<b>reads</b> 67:3 166:19	116:21 125:19
<b>produces</b> 94:5	146:7 149:5	187:25	205:16 210:15	178:25 180:2,7
<b>production</b> 71:12	160:19 161:15	<b>pursuant</b> 2:20 28:3	<b>ready</b> 7:1	199:15 203:20
215:12	163:16 164:18	163:10 167:6	<b>real</b> 188:13	208:22 211:5
<b>Productions</b> 71:9	191:19 192:18	<b>put</b> 38:12 44:5,6,8	<b>really</b> 34:7,10 95:9	212:5
71:10,11,17	195:14 197:3,13	44:11 66:17 74:12	114:11 136:13	<b>receptionist</b> 71:1
105:12,17 106:1	206:24 207:1,6	74:13 86:22 160:9	150:25 151:19,21	<b>recess</b> 54:13 96:9
106:18,19 107:11	210:21 215:9	174:6,11,19	154:9 163:15	171:25 214:23
108:25 109:2	218:17	177:22 187:9	167:11 178:18	<b>Recipient</b> 5:10
115:8,13,15,20	<b>provider</b> 122:11,13	188:15 205:4	185:17 193:21	137:22
116:10 117:7,12	123:1 133:21,22	215:6,23	212:18	<b>recollection</b> 9:24
117:15 118:18,21	133:23 134:2	<b>putting</b> 107:6	<b>reason</b> 33:12 35:7	14:14 30:25 41:25
120:15 125:11,12	136:4,17	<hr/>	56:21 138:15	55:13 56:4 57:5
125:19,23 129:16	<b>providers</b> 136:2,3	<b>Q</b>	174:13 183:21	57:11,21 61:9
<b>profile</b> 93:25	<b>providing</b> 32:24	<b>Quant</b> 196:7	186:24	63:7 64:22 66:10
<b>progress</b> 175:22	62:5 84:18 95:12	<b>quarterly</b> 108:10	<b>reasons</b> 23:14	108:9 109:17
<b>project</b> 49:14 92:9	104:21,24 105:2	<b>question</b> 9:12 32:9	117:10	121:13 134:18
92:13,17 93:7,22	114:14 124:9	35:7 48:14,16	<b>recall</b> 11:19,21	135:22 154:3
93:24 94:4,8,11	134:10,15 135:23	57:25 60:21 62:22	14:22 20:15 27:19	183:7 194:2,3,9
94:21 212:12	142:9 145:25	64:2,20 65:17,19	28:16 44:7 46:3	212:11
<b>project's</b> 94:2	146:4,9 156:23	82:10,18 86:12	55:7 67:14,17,22	<b>record</b> 6:5 54:11,14
<b>projections</b> 102:24	157:1 158:23	114:15 141:2,19	67:25 68:17 78:7	96:7,10 171:23
103:9 209:22	162:13 182:16	163:13 186:19,23	95:17 103:19,22	172:1 214:15,17
<b>projects</b> 25:4	186:18 191:6,9	191:23 192:1	109:13,23 115:1	214:20,21,24
<b>prompted</b> 10:17	202:3	194:7 212:25	115:16 119:15	215:6 216:3,7
21:19 23:11 67:17	<b>public</b> 6:6	<b>questions</b> 5:16 9:14	122:10 123:22	218:10

<b>records</b> 23:18 34:24 38:16 54:19 55:12,15,17 61:8 63:7 64:21 66:10 76:18 213:8 <b>reduce</b> 79:9 205:1 <b>refer</b> 13:17,20 16:19 29:16 52:2 82:9 86:25 164:3 166:7 183:11 185:8 <b>reference</b> 46:24 50:23 51:23 52:5 72:10 73:3 75:10 77:13 78:22 80:12 80:13,20 84:8 87:23 88:10,25 90:19 92:2 102:9 105:11 110:21 111:1 122:3 124:24 125:10 130:6 155:5 156:13 160:11 161:1 163:5,20 166:6,10 168:1,25 169:19 170:5 175:23 177:25 180:7,10 181:17 182:10 183:12 184:2 186:12 189:8 200:21 <b>referenced</b> 180:6 <b>references</b> 88:11 88:11 143:1 <b>referencing</b> 211:21 <b>referred</b> 28:3 92:5 213:19 <b>referring</b> 27:22 48:15,25 50:20 52:7,10,24 53:13 53:18 55:17 62:1 65:21 68:10 70:8 70:11 72:8,19,22 73:4,13,14 77:5,8 78:25 86:24 89:1 90:20 94:15,18 99:13 103:1	106:12 111:9 115:17 118:19 128:9 129:24 133:11 136:6 151:21 154:25 158:8 159:18,19 159:20,21 160:16 164:1 168:5 171:4 184:8 214:8 <b>refers</b> 157:3 169:4 170:9,23 181:4 189:5 203:18 <b>reflect</b> 40:18 100:2 108:18,20 158:22 <b>reflected</b> 39:22 40:6,14 97:20 112:17 113:13 127:12 131:25 171:15 177:12 <b>reflecting</b> 101:3 103:13 126:3 149:2 <b>reflects</b> 30:18 38:20 39:12 40:11 43:14 54:24 76:24 90:14 97:16 98:9 98:21 99:6 101:11 101:23 108:12 113:24 115:7 119:10,25 120:8 120:17 127:7,19 128:13 129:10,15 130:2,18 132:19 133:1 136:18,23 138:4 139:13 156:22 161:10 168:9,10 169:6 178:24 184:5,21 190:9 <b>refresh</b> 48:22 55:13 56:3 57:5,11 61:9 63:7 64:22 66:10 72:2 183:7 <b>regard</b> 63:8 64:22 183:7 <b>regarding</b> 19:17 48:14,16 78:6	146:19 194:24 <b>Regards</b> 205:18 <b>regular</b> 71:15,18 136:17 <b>relate</b> 176:7 <b>related</b> 33:7 42:9 61:24 62:9 141:6 141:11,23 142:9 142:12 164:16 197:12 201:20 <b>relating</b> 33:11 <b>relation</b> 149:8 <b>relationship</b> 104:3 140:23 151:25 178:7 182:25 196:19 212:16,18 <b>relative</b> 6:8 218:12 <b>relevance</b> 93:13 <b>remember</b> 11:7,16 11:18 21:18,23 22:9 33:10 38:14 38:19 42:4,24 47:21,24 54:3 59:6 71:15 74:6 75:6,9 97:22 90:18 103:10,15 100:18 103:10,15 103:17 104:16,18 104:20,23 105:4,9 106:23 109:3 113:2 117:4,13,17 118:21,23 128:21 133:16,18,24 134:3,13 135:19 136:5 143:8 144:2 144:23 145:3,3,17 146:21,21,23 147:2,10,14,16 148:10,13,15 149:3 150:2,10,13 150:15,17,20 152:12,19 153:23 154:9 160:21 163:14,19 167:10 172:25 173:21 174:5,21,22 177:16 179:19 180:19 183:3,5,15	194:1,15 201:10 204:3,7 209:1 211:10 212:4,7,7 212:8,9,9,10,12 213:11,18 <b>reminding</b> 86:20 <b>removed</b> 16:2,4 <b>rent</b> 32:15 50:2 72:4 73:3,4,8,9,17 75:9 81:16 114:8 114:21 121:1 123:5,6,7,9 144:15 <b>renting</b> 75:8 <b>repeatedly</b> 72:13 <b>repetitive</b> 96:16 192:4,7 <b>reported</b> 45:3 168:11 <b>reporter</b> 7:2,3,5,11 8:5 10:7 38:1 44:14 48:2 66:20 71:21 76:1 79:13 83:14 87:12 89:18 96:24 111:25 119:1 126:16 131:5 137:15 138:24 152:21 172:8 197:17 218:2,17 <b>represent</b> 6:22 <b>representative</b> 7:24 <b>request</b> 67:15 103:5,6 168:10 169:7 174:20,22 182:13 201:18 215:12,16 <b>requested</b> 5:19 53:12,23 68:16 69:14,18 91:22 218:16,16 <b>requesting</b> 51:10 67:11 89:8 169:22 170:12 171:7 201:12 206:12 208:13 <b>required</b> 26:19	27:2 108:3,4 <b>requirements</b> 17:8 21:7 <b>residence</b> 136:8 <b>resolutions</b> 17:11 <b>respect</b> 63:8 64:3 65:8 94:4 103:17 103:19 192:11,17 <b>respective</b> 92:21 <b>respects</b> 75:22 <b>responded</b> 81:1,6 82:13 84:21 85:22 86:6 87:5 <b>response</b> 216:1 <b>responsibilities</b> 59:9 <b>responsible</b> 58:18 <b>responsive</b> 215:11 <b>rest</b> 78:18,19 81:8 81:12,18 82:4,11 87:1 <b>retainer</b> 200:22 <b>returns</b> 27:2 <b>revenue</b> 27:3 140:12 <b>review</b> 9:10 218:15 <b>reviewed</b> 20:13 112:17 <b>reviewing</b> 49:4 213:8 <b>rewind</b> 64:11 <b>rewritten</b> 94:1 <b>rid</b> 74:19,20 <b>right</b> 7:5 8:17,20 11:2 14:1,5 17:15 22:16 25:8,10,13 29:13 36:16 51:8 58:10 65:22 68:19 91:25 93:6 97:7 101:5,5,18 102:2 105:11 110:21 113:2,24 116:14 121:16 128:12 129:8,14,19 132:25 133:3,19 136:20 138:12 139:19 140:22
--	---	--	---	---

142:5 144:2	115:23 116:1,15	<b>scanning</b> 197:6	112:14 113:12,17	47:8 130:12,12
145:18 151:1	116:22,23,25	212:10	113:20 114:1	193:18 201:24
152:13 154:18	117:6 141:15	<b>scent</b> 93:4	115:9 117:21	203:23 204:18
156:13,24 160:25	178:25 179:8,19	<b>SCHER</b> 1:9 2:8	119:9,13,22	205:5
161:17 162:5	179:22,23 184:22	<b>SCHOTZ</b> 3:3,8	120:12,14,21	<b>sending</b> 35:20
166:20 168:15,25	184:25 185:20	<b>scope</b> 93:11	121:6 122:5 125:1	91:11 130:12
169:9,14,16 170:6	190:10	<b>script</b> 94:1	125:11,13,14	155:23 166:17
171:22 173:20	<b>sale</b> 201:7	<b>Sec</b> 218:4	126:22,25 127:6	208:17
174:12 176:18	<b>SAN</b> 3:14	<b>second</b> 13:16 38:6	127:23,25 128:3	<b>sends</b> 15:3
179:6,6 184:11	<b>Sandi</b> 7:2	49:7 61:14 80:16	128:15 129:13,17	<b>sense</b> 11:8 200:20
186:1,4,15 187:8	<b>Sandra</b> 1:21 2:19	91:2 99:2 120:5	129:19,21 130:4	<b>sent</b> 45:21 46:14
187:8,22 189:14	163:20,22 218:1	132:3 161:7	130:20 131:12,15	80:17 88:23 90:4
197:15 198:7,24	218:24	183:24 202:19,24	131:20,21 132:5	90:5 91:4 130:11
206:8	<b>Santa</b> 2:17 6:12	210:18	132:23 133:3	188:5 193:19,25
<b>right-hand</b> 13:21	<b>sat</b> 113:6	<b>secretary</b> 12:6,9	134:22 135:16	203:22 204:6,8
155:4 167:24	<b>saved</b> 175:9 204:23	13:11 16:20	137:1,23 138:2,6	212:3 214:1
170:23	<b>savings</b> 112:25	<b>section</b> 12:16 26:18	139:9 154:18	<b>sentence</b> 80:16
<b>rights</b> 201:9	113:3	155:11 156:3	155:7,14 156:8,11	89:24 91:2
<b>Robert</b> 144:1 150:1	<b>saw</b> 43:24 82:6	158:12	156:15 160:14,25	<b>September</b> 167:20
150:2,4 159:7	97:20 98:10	<b>see</b> 9:2 10:24,25	161:2,12 163:7	<b>series</b> 79:16 198:1
<b>role</b> 94:4	127:19 132:19	11:22,24 12:21	166:4,10,13,20,22	<b>service</b> 15:3,16,24
<b>Ron</b> 73:24 74:12	<b>saying</b> 51:13 86:16	14:3,7 15:7 16:22	168:2,4,15,18,24	16:3 17:22 21:10
196:12,13 198:14	115:23 204:14	17:19 19:1,9,13	169:3,16 170:7	168:1,4,7 170:24
214:2	210:1,2	19:25 20:9 26:20	171:1 175:25	191:13 199:5
<b>roughly</b> 180:21	<b>says</b> 8:17,19,25	29:10,11,13 30:21	176:5 177:1 178:2	<b>services</b> 6:6 7:3
<b>routine</b> 32:18,18	11:23 12:6,20	32:12 33:21 34:18	180:21 181:2,20	9:21 10:21 27:22
<b>Rule</b> 4:9 8:8	14:1 15:1 29:14	35:13,18 36:19,25	181:24 182:3,6,22	27:23 30:20 31:3
<b>run</b> 32:2 143:23	38:23 46:18 81:14	39:8,16,19,25	184:3,6,13 185:19	31:3 32:20,24
149:19 187:19	82:11 83:25 87:8	40:10,13 43:17,21	185:25 186:10	33:24 34:12 35:16
<b>runner</b> 135:5,6,9	89:6 91:6 97:10	44:20 45:15,23	188:4 190:20	43:6 55:9 56:25
135:10	97:19 99:1 100:10	47:10 49:9 50:5	191:4,12 198:10	60:25 61:16 62:5
<b>running</b> 143:22,23	102:1,4,8 112:15	51:25 53:7 55:1	199:2 200:24	63:24 64:7 65:4,9
149:24 158:3	119:14 120:25	56:14 57:17 60:17	203:12,16 206:7	76:25 80:14 84:16
159:8 161:20	130:7 138:7	61:18 63:13 65:6	209:5,9,15 210:18	84:17,18 85:14
<hr/>				
<b>S</b>				
<b>S</b> 3:8 4:7 5:2 6:20	139:16 155:14	65:7 67:3 75:12	211:20	90:15 94:23 97:10
<b>sal</b> 185:5	156:10,25 160:12	76:9 77:2,21	<b>seeing</b> 203:25	103:13,21 104:6,8
<b>salaries</b> 176:11,15	160:12 166:12	78:20 79:23 80:6	204:2 212:8	104:9,11,21,24
178:12 179:4,7,10	167:25 168:14	80:18 81:9 82:20	<b>seen</b> 8:10 9:4 14:19	105:3 109:9,11
180:2,4,7 181:3	175:24 176:10	84:25 85:25 87:24	20:17 38:18 61:11	112:12 113:14
184:17 185:5,14	179:3 182:1	90:1,17 92:24,25	97:2 112:9 119:7	119:11 120:2
189:1	183:20 184:24	97:7,10,14,18,23	139:11 146:25	126:23 127:9
<b>salary</b> 67:4,12,23	186:2,6 191:7,9	98:3,17,19 99:4,8	153:18,19,25	130:19,22 131:1
67:24 68:1,3,5,15	203:22 206:9	100:13 101:21,25	154:1,2,3 203:24	131:13 132:21
68:18,23 69:1	207:7 209:10	102:1,11 105:11	204:7 208:25	134:10,17 135:24
70:3 71:14,16,18	<b>scan</b> 69:4 205:5	105:18,24 106:4	211:9 213:3	139:24 140:1,4,8
	214:1	108:14 110:21	<b>Select</b> 5:10 137:22	140:15,16,25
	<b>scanned</b> 74:19	111:3,12 112:7,11	<b>send</b> 37:11 46:20	141:6,11,21,23,23

142:10,11,12,16	37:23 95:11 96:21	77:10 104:5 113:9	146:18 159:17	182:23 183:1,4
146:1,5,7 149:11	136:22 174:10,14	119:8 120:7	208:10	185:1 186:18
149:12 156:20	184:15 188:16	123:10 132:2	<b>sorts</b> 154:4,13	187:6,12 188:4,12
160:19 161:15	197:15	133:2,5 139:12	<b>sound</b> 22:16	189:16,20,22
162:14,21 163:11	<b>showed</b> 138:19	150:5 165:19	<b>sounded</b> 191:3	190:14 191:2,19
163:15 164:19	<b>showing</b> 44:12	167:19 191:20	<b>sounds</b> 139:19	191:22 192:18
169:8 177:9 181:5	172:4 174:16	195:5 206:5	152:13 173:20	193:14 194:5
181:11 185:23	<b>shown</b> 66:1	212:16 213:3,7	<b>source</b> 34:25 35:6	200:6,15
186:12,17 189:15	<b>shows</b> 92:21	<b>sit</b> 42:5 43:10 56:6	46:1 76:11,16	<b>Sovrin's</b> 158:5,7
191:5,10,19,21	<b>shut</b> 21:17,19,21,23	57:3 60:23 61:21	79:25 86:3 90:7	<b>space</b> 74:3,5,11,12
192:17 193:9,14	22:2 23:1,19,22	76:15 78:13 92:25	<b>south</b> 24:2 25:7,10	74:16,20,22 75:5
195:14 197:3,5,12	<b>sic</b> 15:19 106:6	153:24 182:24	147:13 173:10	75:8 123:7 150:25
198:17,19 200:3	161:19,19	183:2 211:13	<b>Sovrin</b> 5:12 22:6	151:1 152:7
200:22 206:11,24	<b>side</b> 10:2	<b>sitting</b> 204:1 211:8	24:6,12,18 43:1	213:22,25
207:2,3,5 209:10	<b>sign</b> 11:5 69:8	<b>six</b> 22:10 116:5	68:13 140:13	<b>SPC</b> 1:4 2:4 3:2,7
209:17 210:15,21	<b>signatory</b> 30:7	121:12	143:2,4,5,16	<b>specific</b> 65:21
<b>serving</b> 130:15	100:21	<b>size</b> 74:7	144:9,17,22,24	109:17
<b>Servsi</b> 168:6	<b>signature</b> 11:3 14:6	<b>sky</b> 181:2	145:1,25 146:5,8	<b>specifically</b> 17:7
<b>set</b> 9:17 10:2,20	16:24 19:5,15	<b>slate</b> 103:9	146:11,18 147:7	19:23 21:23 28:17
11:17 17:22 25:21	20:11 26:9 217:13	<b>slightly</b> 28:15	147:18,19 148:2,5	32:1,3 33:10 36:4
32:3 42:11 143:5	<b>signed</b> 11:7,8 14:9	<b>small</b> 91:4 118:7,8	148:7,7 149:8,9,9	42:25 57:8 62:16
143:7,11,12,13	14:13 17:25 18:1	167:9	149:11,12,18,19	63:8 67:16 72:25
152:6 182:1 218:6	21:6 26:11,13	<b>smell</b> 93:4	149:24 150:10	73:1 84:20 91:18
<b>settled</b> 23:16	27:1 28:4	<b>Socialization</b> 83:7	151:23 152:10,11	103:22 104:18,20
<b>seven</b> 22:10 103:22	<b>signing</b> 21:2 157:15	<b>sole</b> 18:16 47:20	152:13 153:6	104:23 105:1,9
106:24 107:5	<b>Silverman</b> 144:1	<b>solemnly</b> 7:6	155:14,24 156:19	107:1,4 109:3
118:23 215:17	150:1,3,4 152:1	<b>Solomon</b> 46:20,24	156:23 157:2,12	117:4,14,17
<b>Seventy-eight</b>	159:7	207:23	157:19,22,23	133:13,18,25
13:18	<b>Simonian</b> 154:22	<b>somebody</b> 101:2	158:16,18,19	137:20 140:25
<b>Shahab</b> 44:18,22	<b>sing</b> 92:20	109:21 151:5	160:19 161:11,16	145:17 148:14
<b>share</b> 28:21	<b>single</b> 35:23 62:18	174:3 185:13	161:21 162:14,21	157:19 162:22
<b>shared</b> 50:21 73:5	62:19,23	188:23,25 207:24	163:10,12,16	174:5 179:20
123:11 125:7	<b>SIP</b> 181:18,22	207:25	165:1 166:17	188:13 204:7
154:25 155:20	182:10,21,25	<b>songs</b> 92:21	167:3,5,9,11,21	211:7
<b>shares</b> 18:7,11,19	183:4	<b>soon</b> 215:14	168:11,22 169:7	<b>speculating</b> 62:13
<b>shit</b> 213:1	<b>SIP's</b> 183:12	<b>sorry</b> 24:25 26:8	169:14,22 170:3	<b>Spelled</b> 170:25
<b>shooting</b> 92:19	<b>sir</b> 7:19,22 8:13	59:25 60:24 67:21	170:12,21 171:7	<b>spend</b> 58:5
<b>short</b> 54:10 99:21	12:2,19,22,25	88:11 94:17	173:14 174:2,7,10	<b>spending</b> 179:14,20
100:5 118:15	13:2,4,9,12,15	101:10,13 123:3	174:14,15 175:21	<b>spent</b> 72:15 91:17
137:11 187:17	14:4 15:6 16:25	126:9 135:24	175:24 176:9,14	174:7 176:17
202:12	17:3 18:3,5,12,15	141:2,10 154:14	176:16,17,20	180:22 181:3
<b>short-term</b> 213:14	18:18,20,23 19:7	167:4 171:11	177:3,4,6,7	188:16,23,24,25
<b>shortfall</b> 137:9	19:12,16 26:12,14	192:14 194:8	178:11,13,22	<b>spoke</b> 25:21 83:1
<b>Shorthand</b> 218:1	26:17 38:11 45:10	198:5 202:22	179:1,7,8,11,17	88:3
<b>Shortly</b> 145:20,21	46:10 48:7 49:24	213:2	179:19,21 180:15	<b>spoken</b> 196:21
<b>shots</b> 64:16	50:22 52:4 54:20	<b>sort</b> 42:17,23 93:5	180:17,22 181:3,9	<b>spot</b> 215:24
<b>show</b> 10:4 28:18	54:22 63:12 64:25	104:19 118:7	181:10,11 182:19	<b>spots</b> 123:19,20,22

<b>square</b> 74:6	173:14 189:15	70:23 73:7 85:15	152:10 155:15,25	72:14,25 93:22
<b>ss</b> 217:1	193:6	105:2 109:16	<b>Systems</b> 152:13	114:17 116:20
<b>staff</b> 207:18,20	<b>stopping</b> 95:24	118:11 122:2,9	<hr/>	153:4 177:13
<b>stamp</b> 18:3,4	<b>storage</b> 73:10	128:8 131:2	<b>T</b>	195:3 197:24
153:12,13	<b>Storing</b> 73:22	139:20 142:25	<b>t</b> 4:7 5:2 152:11	<b>telling</b> 50:12 51:12
<b>standard</b> 123:14	<b>STREET</b> 3:4,9	167:16 168:20,21	<b>T-Mobile</b> 128:14	51:18 89:10
<b>Stanton</b> 133:6	<b>strictly</b> 70:20	170:9 173:2,20	128:18	148:24 159:4
<b>staples</b> 125:6	<b>strike</b> 13:5 19:4	177:21 185:9	<b>T-Mobile</b> 128:21	162:15
<b>stars</b> 92:20 93:2	34:9 37:3 50:9	188:4 195:17	<b>table</b> 53:12,17 54:5	<b>ten</b> 64:2 65:17 66:1
<b>start</b> 11:13 21:8	72:8 76:14 91:9	202:1,4 208:11	<b>take</b> 9:7 30:4 39:2	92:15
79:20 162:17	103:18 168:9	214:12 215:22,25	52:14 54:10,17	<b>terms</b> 32:14 186:22
<b>started</b> 25:23 84:2	173:18 179:14	<b>Swartz</b> 27:17,21,22	68:22 71:19 96:5	<b>testified</b> 7:14 9:16
148:8 192:3 213:9	182:9 183:10	28:3,4,5,12 30:20	100:8 116:11,18	9:20 24:1 42:10
213:12	<b>structure</b> 144:23	30:23 31:3,6,9,12	118:9 127:4,16	44:22 51:1,7 92:8
<b>starting</b> 67:5	145:4	31:21,23,25 32:21	137:13 138:22	111:11 116:14
<b>state</b> 6:22 15:15	<b>studio</b> 49:13	33:8,13,14,23	141:17,18 142:24	121:14 124:8
217:1	<b>stuff</b> 31:8 43:3,4	34:12 35:16,20	142:24 169:3	133:20 134:9
<b>statement</b> 10:24	69:21 71:2 73:1,1	36:2 38:21 39:8	171:22 189:18,20	146:4
13:23 14:24 29:5	73:9,22,24,24,25	40:3,12,22 41:1	189:24 205:4	<b>testify</b> 146:3
29:21,25 34:5,6	74:1 75:2,3	43:6,8,24 54:25	214:14	<b>testimony</b> 24:16
97:21 112:17	124:20 125:23	55:9,20 56:12,25	<b>taken</b> 1:17 2:16	32:19 48:18 57:22
<b>statements</b> 26:19	135:13 153:21	57:16 59:16 60:2	6:12,19 54:13	57:24 59:20 92:6
29:9,20 127:2	177:15 197:7	60:8,15 61:1,3,4	96:9 152:17	117:6 134:15
215:8,11	202:6 207:21	61:16,24 62:6,9	171:25 184:16,17	158:4,17 160:4
<b>states</b> 1:1 2:1 6:15	214:3	62:15,20,24 63:2	214:23 218:5	162:12 165:22
12:11,16 15:14	<b>subject</b> 45:13 67:8	63:16,24 64:7,18	<b>talk</b> 9:15 89:15	179:13,16,18
36:21 69:7 80:17	83:23	65:10 66:7 76:25	111:13 119:17	215:7 218:10
84:4 105:25	<b>subpoena</b> 93:11	77:5 78:2,9 80:9	192:13,15 212:24	<b>TEXAS</b> 3:4
113:19 156:6,18	<b>subsequently</b> 162:5	80:14 90:21,25	<b>talked</b> 34:4 95:21	<b>text</b> 173:6
171:11	<b>substantially</b> 164:5	91:19,25 95:5,20	119:23 127:14	<b>Thank</b> 7:1,11 8:23
<b>status</b> 51:5 93:6,22	<b>success</b> 70:4	97:10 98:4 105:22	151:5,7 154:22	28:1 30:3 87:10
<b>steps</b> 152:17	<b>successful</b> 151:20	112:12 113:4,14	178:3 188:11	93:19,20 96:5
<b>Steve</b> 49:8,11,12,15	151:22 165:13	119:11,15 120:1	196:1	101:13 172:6
70:22 84:2 136:14	196:14 198:22	120:10 126:23	<b>talking</b> 49:3 173:25	197:20 216:2,3
147:3,5 153:20	<b>SUITE</b> 3:4,14	127:9,20 131:13	<b>tape</b> 64:12	<b>Thanks</b> 86:7
154:6 157:7	<b>summary</b> 5:13	132:4,8,20 138:9	<b>Tax</b> 27:4	205:18
176:12 178:14	175:18 182:15	138:13,17 149:8	<b>Taxation</b> 27:3	<b>theater</b> 93:3
185:13 186:6	<b>supplies</b> 121:2	149:11,13,14	<b>taxes</b> 35:5 46:19	<b>Theaters</b> 92:3 95:7
190:5 195:17	125:5 135:13	159:18 160:2,6,10	59:12 200:17	<b>theme</b> 92:22
202:5 207:21	<b>support</b> 185:22	182:9 183:19	<b>TECHNOLOGI...</b>	<b>they'd</b> 69:8 150:13
<b>stickers</b> 81:25	186:3,7 191:6	<b>swear</b> 7:4,6	1:10 2:9	<b>thin</b> 181:13 190:17
<b>stockholders</b> 18:25	<b>Supporting</b> 202:10	<b>Sweet</b> 87:6	<b>technology</b> 195:11	<b>thing</b> 26:24 35:22
<b>stop</b> 22:3 75:5	<b>supposed</b> 165:9	<b>switch</b> 128:22	<b>tedious</b> 96:15	35:23 85:11 105:7
147:9,12	210:25	<b>switched</b> 128:22	<b>tell</b> 7:7 22:23 29:3	109:19 124:23
<b>stopped</b> 22:1,5	<b>sure</b> 15:18 28:16	134:5	31:15 32:13 34:19	130:13 134:4
23:25 24:12,14	48:24 52:16 58:23	<b>sworn</b> 7:13 218:7	36:5,6 38:4 58:4	147:22 157:5
25:2 147:14,16	59:12 67:19 70:5	<b>system</b> 124:23	58:22 60:5 65:22	161:12 172:20

181:14 190:7,19 192:12,19 210:2 210:23 <b>things</b> 21:13 24:1 25:7,9 31:19,21 32:1 45:9 50:19 52:17 60:11 61:24 62:8 75:18 83:8 93:5 103:4 107:5 118:7 133:25 135:21 140:9 142:15 147:13 160:1 173:10 214:2 <b>think</b> 8:11,17 13:18 14:16,20,25 16:1 23:13 24:7 26:24 27:14 36:17 41:4 42:19 46:3 47:21 51:6 71:6,10,16 72:12 75:23 92:22 95:13,22,23 97:3 100:20 103:10 104:18 105:7 110:16 112:25 113:1,7 119:17,18 119:23 122:8,9,12 122:15,16 123:2 124:3 128:18,19 128:21,25 133:7,9 134:3,6,6,11,13 134:19 141:14,19 142:1,5 143:18 145:2,6,7,20,22 146:22 147:2,20 147:22 148:1,9,10 148:12 149:3,21 150:1,7,18 151:6 152:12,16 153:19 153:23 154:1,2,6 158:6 159:5 162:22 163:18 167:12 172:19 173:16,24 174:7 175:20 180:19 182:20 183:13 187:2 188:3,10,10	193:11,19 194:12 195:9,11,15 200:16 201:9 208:11 211:2 214:10 <b>thinking</b> 159:2 <b>thought</b> 31:10 151:15,16,17,20 <b>thousand</b> 53:5,9 <b>three</b> 65:1,7,23 83:4 88:11 118:1 136:2 173:11,12 173:12 176:2,17 189:1 190:7,8,19 202:6 <b>Thursday</b> 1:18 2:19 6:1 85:24 <b>tied</b> 60:11 133:9 <b>time</b> 6:10 13:3,7,10 13:13 14:13 16:17 20:21 21:22 23:2 23:24,24 24:1 25:2,5,6,8,9,10,15 27:1,13 29:22 31:5 35:7 42:1 43:2 46:1 47:2 59:18 62:4,7,12 62:17,20,21,25 64:13,14 69:15 70:25 73:16 74:10 81:15 84:14,20 85:4 104:10,13,22 106:14,17 107:1 107:12 108:16 109:10,14 110:4,6 111:16 112:20 113:1 114:6,12,16 115:2,13 117:20 119:16 120:18 122:17,20,23,24 124:1 125:4,20,22 126:1 128:7 131:1 132:15 134:17 135:14,18,18,19 135:23,25 136:9 136:11,12 138:10 139:18 141:24	142:1,5 143:9 144:4 145:18 147:12 151:3 161:15,25 162:3 162:14,21 163:25 167:1,5,11 171:24 173:6 174:11 179:20 180:19 186:20,21 188:8 192:2,12 209:19 <b>tomorrow</b> 45:22 46:21 47:9 91:4 136:11,12 138:10 <b>top</b> 10:24 14:1	22:20 29:13 40:9 76:23 79:7 82:13 83:3 125:10 128:2 137:21 154:18 155:4 167:24 168:24 169:16 170:6,23 175:20 175:23 195:6 <b>topics</b> 8:18,25 9:1,4 9:8,10,13 <b>total</b> 116:25 139:14 161:1 166:21 168:16 171:10,15 176:17 178:21 182:2,5 <b>touch</b> 43:2 <b>tough</b> 138:10 <b>town</b> 214:8 <b>tracked</b> 79:10 <b>tracks</b> 28:17 <b>tractions</b> 106:24 <b>transaction</b> 27:16 28:12 29:3 30:7 30:14 33:19 35:15 40:9 54:23 59:19 60:13 63:15 65:23 76:23 83:24 90:13 127:6 159:21 198:20 201:6 212:9 <b>transactional</b> 198:23 <b>transactions</b> 25:17 28:15 30:16 31:1 35:11,24 36:14 56:20 65:1 66:1 68:11,14 159:22 164:22 165:4 <b>transcript</b> 218:16 <b>transfer</b> 28:8 35:16 36:9,21 37:8 39:8 39:12,20 40:3 43:14,19 46:5,14 47:8 56:11 57:15 60:15 61:1,16,20 63:16,19 64:4 65:4 80:7 90:15	100:6 103:20 112:11 127:7 141:22 165:17 <b>transferred</b> 27:17 28:2 95:6 105:22 117:10 <b>transferring</b> 115:12 <b>transfers</b> 4:12 5:5,6 5:7,8,9 28:16 38:5 38:6,21 40:18 43:24 44:3 65:21 66:3 69:13,17 112:16 119:20 181:18,22 182:2,5 182:9,10,15,19 183:12 <b>transit</b> 196:5 <b>transition</b> 164:21 <b>trial</b> 97:5,6 112:5 119:5 126:20 131:9 137:19 139:3 174:5 <b>trips</b> 83:6 <b>true</b> 26:15 36:8 163:15 180:1 187:11,24 213:9 217:7 218:9,21 <b>trust</b> 1:9 2:9 80:17 80:21,23 81:7 <b>trusted</b> 114:15 <b>TRUSTEE</b> 1:9 2:9 <b>truth</b> 7:7,8,9 <b>try</b> 60:10 69:23 205:1 <b>trying</b> 49:21 69:10 83:2 86:22 110:13 135:5 140:9,10,11 140:14,22 157:15 162:22 184:15 185:18 195:23 207:17 208:9,16 <b>TT</b> 1:4 2:4 3:2,7 5:10 27:17 28:13 137:22 160:8,9 <b>turn</b> 8:12 13:16 15:4 18:2 22:21
---	---	---	---	--

33:17 35:9 36:11 39:3 40:8 43:12 54:21 63:11 97:25 113:8 120:5 132:17 161:7 167:18 170:15 202:24 206:17 209:2 210:7 <b>Tussauds</b> 92:23 <b>Tutor</b> 73:24 196:12 196:13,19 197:3 197:12 198:14 211:19 212:3,10 <b>TV</b> 201:10 <b>twice</b> 83:4 210:25 <b>Twirsky</b> 149:20,25 150:6 <b>two</b> 21:25 35:11 36:14 71:11 81:24 82:24 88:10 103:4 104:17 120:14 126:4 131:12 134:8 143:24 147:20 148:1,13 149:20,23 150:3 153:19 167:8 172:24,25 173:1 173:12 182:21 185:7 187:19 211:4 215:7 <b>type</b> 135:13 147:22 174:23 <b>typed</b> 172:23 <b>typically</b> 30:12 35:2,3 50:18 99:20 <b>typo</b> 199:6	65:24 88:13 100:12 115:10 129:18 136:15 155:13,16 186:16 199:3 203:6 209:11 <b>ultimately</b> 150:18 78:2,9,11 81:2,12 82:1,5,7,10 91:9 <b>um</b> 13:25 14:16 24:4,9 25:8 26:18 27:10,14 31:18 73:25 156:19 <b>unaware</b> 162:18 <b>uncle</b> 15:22,23 134:24 135:4 <b>unclear</b> 8:22 <b>underneath</b> 102:19 111:1 156:3 186:9 <b>understand</b> 7:23 11:10 21:5 22:25 27:25 28:7 41:6 43:23 44:1 50:9 59:8 76:11,15 78:1,8 90:3 96:14 124:19 140:14,22 141:2 142:12 152:14 164:15 170:16 210:2 215:25 <b>understanding</b> 14:23 18:10 19:3 19:17 25:14 34:2 35:19 37:2,6 40:25 42:2,6,13 45:25 49:4 55:3 56:21 58:19 74:21 77:23 84:13 86:2 88:1,6 90:6 94:20 100:15 137:3 156:17 171:18 182:14,18,25 207:14 210:20 <b>understood</b> 17:1 31:23 57:23 59:20 70:16,20 80:23 95:4 <b>unfortunately</b>	<b>VS</b> 1:6 2:6 <hr/> <b>W</b> <b>W3:3</b> <b>wages</b> 177:2,11 184:5 189:9 <b>waiver</b> 19:9,25 <b>Walker</b> 3:3 6:24,24 13:19 20:14 27:15 92:6 93:15,20 214:17 215:2,3,6 215:16,19,23 216:2 <b>Wang</b> 195:5 203:5 203:21,23 206:11 <b>want</b> 8:20 23:17 30:13 35:11 36:13 53:6 54:17 61:15 63:14 65:1 96:3 96:14,16 98:14 128:23 148:23 153:1 202:12 214:17 215:23 <b>wanted</b> 35:3 52:6 53:9,17 68:8 70:4 72:17 188:22,23 215:6 <b>warehouse</b> 46:20 73:8,9,10,14,15 73:17,18,21 74:2 74:8,11,15,22 75:5,8 213:19,24 214:6 <b>Warner</b> 135:15,18 135:19,23 136:9 136:12 <b>warranted</b> 68:1 69:1 <b>Warshawsky</b> 84:9 <b>Warshawsky's</b> 84:16 <b>wasn't</b> 31:7 60:8 68:22 81:21 93:18 95:8 116:10 <b>voice</b> 69:6 <b>voiceover</b> 124:22 <b>Volume</b> 6:18	189:17,22 194:6 <b>water</b> 106:7,8,10 106:18 107:2 <b>Watson</b> 36:23 37:9 130:7 <b>Watson's</b> 77:19,24 78:3,10,14 <b>way</b> 33:2 34:8,10 62:10 90:22 91:1 91:14 92:1 114:10 145:9,11 151:16 159:17 173:7,8 180:3 <b>ways</b> 160:5 <b>WDP</b> 106:6 <b>we'll</b> 86:25 214:19 214:19,20 <b>we're</b> 54:11,14 89:14 93:12 151:10 152:7 172:1 200:5 202:16 208:2,17 214:21 <b>we've</b> 20:17 39:11 46:12 55:11 86:24 111:8 127:2,14 129:24 157:13 160:10 186:20 196:1 213:3 <b>web</b> 124:2,7 <b>week</b> 50:1 87:18 <b>weekend</b> 49:8 <b>weeks</b> 16:2 81:24 117:17 <b>weird</b> 206:10 <b>well-regarded</b> 198:22 <b>Wells</b> 29:5 38:6 99:12 112:21 181:18,22,23 182:12 <b>went</b> 23:17 24:2 25:7,10,23 38:24 74:17 82:24 83:3 90:5 111:6 114:20 119:18 121:4 125:11 142:5
--	---	---	--

147:13 157:25	68:7,10,10,25	202:5 209:23	159:23 167:4	130:3,15 180:14
158:15,20 164:5	69:10,12,16,24	<b>works</b> 93:24	173:9,11 175:3,13	185:11 213:13
175:19 180:20	70:13,16,20 75:16	<b>worth</b> 93:15	176:22 178:3	<b>Zarrinkelk's</b> 28:20
185:5 210:6	75:17,18,21 96:2	<b>wouldn't</b> 37:13	188:22 192:5	37:4,7 39:4 54:18
<b>weren't</b> 13:7,11,14	103:7,11 109:15	68:22 116:11	195:8 211:23	66:24 76:19
24:5 176:13	109:18,19,23	136:9,10 141:18	214:7,19	101:14 186:9
<b>Western</b> 6:16	110:4,7 124:2,7,7	142:24 204:21	<b>year</b> 19:22 21:17	191:12
<b>Weston</b> 42:19 43:2	124:10,12,15,16	<b>wound</b> 26:23	21:24,24 23:7,17	<b>Zero</b> 84:23
43:7 68:12 69:7	124:16,18,21	<b>wrap</b> 214:20	67:4 68:16 94:3	<b>Zhi</b> 195:5
143:18,22 151:6	129:4 140:19,21	<b>write</b> 41:8 45:20	117:2,3 134:8	<b>ZKCO</b> 36:22 37:4
151:18 195:9	140:23 142:17,19	48:8 60:6 72:2	176:9 180:4 181:7	<b>0</b>
<b>whatnot</b> 24:9 59:13	150:9 157:7	79:6 101:5 164:16	185:6 189:19,21	<b>07601</b> 3:10
195:22	158:15,20 159:4	167:9	189:25 190:6	<b>1</b>
<b>whatsoever</b> 144:7	162:18 163:3	<b>writes</b> 77:11 89:25	191:19,22 193:6	<b>1</b>
<b>whichever</b> 52:25	164:6,10,13,16	<b>writing</b> 86:11	193:10	<b>1</b>
<b>Whoa</b> 98:2	168:12 169:23	<b>written</b> 84:4	<b>years</b> 21:20,25 22:9	<b>1</b>
<b>WIECHERT</b> 3:13	170:13 171:8	103:13 115:15,20	22:9,10,10 23:3	4:9 8:3,4,8 26:6
<b>Wil</b> 215:3,20	175:22 179:7,11	116:9 126:3	73:13 74:17,17	84:4
<b>William</b> 3:13 6:25	179:14,17 180:15	146:18 149:1	84:19 92:10,14	<b>1,000</b> 111:6
<b>WILLIAM@DA...</b>	195:16,16,17	160:18 163:9,17	103:23 104:12	<b>1,200</b> 81:23
3:15	197:7,13 199:16	175:20	106:25 107:5	<b>1.4</b> 189:1
<b>Wimbledon</b> 1:4 2:4	200:2 201:19	<b>wrong</b> 134:19	109:12,22 118:23	<b>1.442</b> 176:17
3:2,7 6:14	205:18 206:14	140:3	121:12 126:7	<b>1.442.3</b> 178:23
<b>wind</b> 93:5	207:15 208:1,2,17	<b>wrote</b> 45:13 49:25	134:5,8 150:14	<b>10</b> 4:11,19 81:7
<b>wire</b> 4:12 36:22	211:21,24,25	53:5 76:7 78:18	173:5,12,13 176:3	83:12,13,17
37:11,12,15 38:5	<b>worked</b> 25:22	79:21 81:2,11,18	176:17 189:1	137:10 148:9
38:24 45:20 46:5	68:11 70:25 74:10	82:4,14,17 84:22	190:8,19 192:19	<b>10,000</b> 210:25
47:8 77:12 84:23	102:21,25 103:2,5	85:23 86:7 87:2	196:4,17,21	<b>10:50</b> 54:12
88:20 89:25 90:4	140:12 146:14	87:18 91:3 123:6	197:10 198:14,15	<b>100</b> 18:7
91:4,23,25 130:7	158:17,19 163:23	148:12,14 159:1	215:17	<b>100,000</b> 54:24
140:5 205:3 207:3	164:20,21 165:4	164:10 204:17	<b>yesterday</b> 7:20	63:15
<b>wired</b> 76:7,12	165:10 177:7	205:2	9:16 10:3 13:19	<b>101,000</b> 171:11
79:21 88:5	196:23,23,24	<b>X</b>	20:13 24:1 25:22	<b>101,083.33</b> 171:12
<b>wires</b> 32:12 34:18	197:9 198:20,21	x 4:7 5:1,2 218:16	27:15 28:9,14	<b>10100</b> 2:17 6:12
34:18 37:10,18	207:19 208:6	<b>Y</b>	34:4,5 42:10	<b>11</b> 4:21 87:9,11,15
83:1	209:20 210:4	<b>Yay</b> 82:14	44:23 46:25 49:1	145:16
<b>withdrawal</b> 101:3,7	<b>working</b> 24:6,12	<b>yeah</b> 10:2 16:1 24:3	51:1 92:5 93:16	<b>11/23</b> 30:14,16
<b>witness</b> 4:2 7:4,10	25:3,16,24 31:16	26:25 37:23 53:3	124:8 138:18	<b>11/29/2012</b> 39:19
96:2 202:15,19,22	31:20,21 32:25	65:20 73:2 92:16	146:12 147:8,13	<b>11:02</b> 54:15
215:15,18 218:6	47:2 61:24 62:7	96:5 102:12	154:22 162:7	<b>11:46</b> 96:8
218:17	62:11,14 64:14,16	113:18 115:5	<b>York</b> 162:8	<b>111</b> 5:6
<b>wonder</b> 82:17	64:17 66:6 68:12	127:24 130:11	<b>Z</b>	<b>118</b> 5:7
<b>word</b> 168:4	68:12,13 102:24	134:11 136:1	<b>Zarrinkelk</b> 44:5,18	<b>11th</b> 29:6,23 65:2
<b>words</b> 213:2	103:3 144:14	146:24 147:19	44:23 45:5 100:25	<b>12</b> 4:22 89:16,17,21
<b>work</b> 22:5 31:6,12	163:24 165:9	149:22 158:19	101:8 125:16,18	<b>12,000</b> 84:14
34:15 42:25 61:2	178:13 195:9,18		125:21 126:2	<b>12:46</b> 96:11
62:20,24 63:5	195:20 196:3			<b>125,000</b> 57:15

<b>12553</b> 1:22 2:20 218:1,25	131:4,8 132:1 139:7,13	190:13,16 191:1 203:21	176:3,18 177:24 178:17 184:8,22	<b>25</b> 3:9 81:7 <b>25,000</b> 130:18,24
<b>12578</b> 29:21	<b>17.7</b> 27:18	<b>20-some-odd</b>	198:9 203:7,21	<b>250</b> 87:20 88:25
<b>126</b> 5:8	<b>172</b> 5:13	150:14	208:23 213:10	109:14,16 140:2
<b>127</b> 29:14 108:12 108:18,20	<b>175</b> 50:1 51:19 <b>175,000</b> 51:11,12	<b>20,000</b> 148:9 156:14,19 166:15	<b>2013</b> 22:16 95:5 147:15 170:20	141:15 <b>250,000</b> 43:16 89:1
<b>12th</b> 161:5	53:10	168:11 169:8,22	171:20 176:3	89:6 112:13
<b>13</b> 4:18,19 5:5 16:13 56:11 79:17 80:6 83:18 84:22 96:22,23 131:20 132:21	<b>1753</b> 176:22,25 177:1 <b>1754</b> 189:3 <b>1755</b> 193:1 <b>1756</b> 38:10	170:12 171:7 178:15 180:12,14 180:16 181:6,8,10 181:12 211:1	178:18,20 189:6 190:9,21 191:24 192:17 212:6 <b>2014</b> 30:2 176:3	113:15 116:25 117:1,2,4 <b>25th</b> 14:2 <b>26</b> 60:14 92:23 <b>27</b> 209:12 210:16 <b>27136</b> 3:14
<b>13,000</b> 121:2,4	<b>1757</b> 38:10	<b>200,000</b> 61:17 63:8 65:4 90:15	178:18,19 193:3,6 <b>2015</b> 173:19	<b>273</b> 124:25 125:4
<b>13,327</b> 47:8	<b>18</b> 5:10 33:17 39:18	<b>200,000.06</b> 190:21	<b>2017</b> 14:2,24	<b>28</b> 1:18 2:19 6:1,10
<b>131</b> 5:9	137:13,14,18	<b>200K</b> 89:25 90:4	<b>2018</b> 26:11	15:5 63:15 203:7
<b>134,000</b> 176:15 178:18	<b>18,000</b> 125:11,15	<b>201</b> 16:17	<b>2019</b> 1:18 2:19 6:1	212:6
<b>137</b> 5:10	125:19	<b>2010</b> 145:16	6:10 218:22	<b>28(a))</b> 218:4
<b>138</b> 5:11	<b>186,000</b> 132:4	<b>2011</b> 4:13,14,15	<b>2025.320(a))</b>	<b>29</b> 4:15 33:19 67:1
<b>13th</b> 2:18 6:12 65:2	<b>19</b> 5:11 18:2,3,3,4	11:6 19:25 29:7	218:14	99:25 100:17
<b>14</b> 4:19 5:6 9:1,8 16:19 83:18 87:3 87:5 111:23,24 112:4	138:22,23 139:2 <b>197</b> 5:14 <b>1K</b> 111:2 <b>1st</b> 26:11 30:2	29:23,23 32:9 33:20 43:15 44:17 48:5 67:1 99:25 100:17 112:13	<b>2025.330(a))</b> 218:7 <b>2025.540(a))</b> 218:8 218:11 <b>204</b> 178:5,9	<b>290,000</b> 45:20 46:1 46:14 <b>2nd</b> 4:22 35:12,15 65:2,3 89:21 90:14,19 119:12 120:2,10
<b>145</b> 129:10	218:22	113:16 139:7,14	<b>204,000</b> 176:15	
<b>149,000</b> 129:15,20	<b>2</b>	173:6 209:12,13	178:8,11,17	
<b>14th</b> 85:23		210:11,16,16	185:18	<b>3</b>
<b>15</b> 5:7 17:4,9 81:7 104:12 118:24,25 119:4 182:2	<b>24</b> 11 6:18 8:12,15 8:19 10:5,6 22:22 26:8 28:11 29:14	213:17	<b>204,500</b> 46:6	<b>3</b> 4:12 8:15 15:4,14
<b>15,000</b> 99:6,25 123:8	<b>2,015,000</b> 182:5	<b>2012</b> 4:16,17,18,19	<b>2093</b> 218:4	37:24,25 39:12,23
<b>15,354.50</b> 178:20	<b>2,295,000</b> 183:19	4:20,21,22 22:12	<b>20K</b> 80:17 180:10	40:6,15 43:12
<b>150,000</b> 30:19 32:7 33:12 38:25 39:8 39:12 40:3	<b>2,529</b> 138:9	22:16 35:12,12,16	181:4	214:16
<b>152</b> 5:12	<b>2,529,000</b> 138:9	36:9,14 43:19	<b>21</b> 5:13 18:22 172:5	<b>3-D</b> 92:20
<b>154,583.33</b> 168:17	<b>2,529,732</b> 138:5,11	56:11 57:15 60:14	172:7	<b>3,000</b> 123:15
<b>157</b> 36:16	<b>2/7/2012</b> 5:14	61:16 63:15 65:3	<b>212,000.31</b> 178:5	<b>3:00</b> 202:11
<b>1578</b> 112:22	<b>2:03</b> 171:24	71:25 76:4,24	<b>214,583.33</b> 171:16	<b>3:09</b> 214:22
<b>16</b> 5:8 11:6 126:13 126:15,19	<b>2:15-CV-6633-C...</b>	79:17 80:6 83:18	<b>21st</b> 210:11	<b>3:15</b> 214:25
<b>165,000</b> 201:13	<b>2:25</b> 172:2	83:18 84:22 87:3	<b>22</b> 5:14 19:5 197:15	<b>3:17</b> 216:7,9
<b>167,753</b> 139:14,18	<b>20</b> 5:12 152:20,24	87:6,16 89:21	197:16	<b>30</b> 81:3 82:10
<b>167.36</b> 36:17	176:10,15 178:4	90:14 119:12	<b>22nd</b> 4:16 57:15	167:20 202:16
<b>17</b> 4:13 5:9 30:4,13 39:6 44:17 131:3	178:12 179:4,6,9	120:3,11 122:18	71:25	<b>30(B)(6)</b> 1:16 2:16
	179:14,17,18,22	126:24 131:20		4:9 8:8
	180:4,20 181:1,14	132:21 139:8,14	<b>23rd</b> 4:14 32:9 48:5	<b>30(e))</b> 218:19
	184:11,17,25	154:17 161:5	<b>24</b> 20:4	<b>30(f)(1))</b> 218:8,11
		162:10 166:2	<b>24,230.79</b> 190:11	<b>30,000</b> 43:20 133:1
		167:21 168:24	<b>242,500</b> 46:14 47:7	136:19
		169:13 170:2	<b>247</b> 106:3	<b>300</b> 135:1,4
		171:19 173:6	<b>24th</b> 29:6,23	

<b>300,000</b> 38:25 39:20 40:11 68:16 77:1,9 97:16,23 98:9 105:22 126:22 127:7,20 130:12 <b>300K</b> 67:4 76:7 <b>30th</b> 4:21 87:16 162:10 169:13 170:20 171:19 <b>31</b> 35:9 39:25 119:21 <b>31st</b> 30:2 61:16 154:17 161:5 166:2 168:24 170:2 171:19 <b>32,000</b> 105:17 <b>33,000</b> 120:18 <b>36</b> 36:11,13 40:8 54:21 76:21 80:3 90:10 127:4 131:18 215:13 <b>361-2822</b> 3:15 <b>37</b> 4:12 57:13 60:14 <b>38</b> 36:16 <b>3rd</b> 209:13 210:16  <b>4</b> <b>4</b> 4:13 44:12,13 <b>40</b> 28:19 31:4,12,15 39:3 54:18 76:19 80:4 90:9,14 110:16 119:21 127:4 131:17 215:13 <b>40,000</b> 60:15 95:6 110:16 115:7,12 116:1 117:10 <b>400</b> 135:15 <b>40K</b> 85:23 <b>4120</b> 3:4 <b>43</b> 26:6 <b>44</b> 4:13 <b>44,000</b> 113:24 114:3,6,19 <b>45,000</b> 100:15,25 <b>458,000</b> 192:21	<b>458,625.94</b> 178:21 <b>45K</b> 100:11 <b>46</b> 97:6 <b>469</b> 3:5 <b>47</b> 46:18 112:6 <b>47,500</b> 46:5 <b>48</b> 4:14 <b>493,846.54</b> 184:5 <b>4D</b> 69:22 92:3,9 <b>5</b> 4:14 11:23 26:18 <b>5,000</b> 118:10,11 <b>50</b> 50:4 52:9 61:13 119:6 <b>50,000</b> 35:17 56:13 <b>50K</b> 79:21,25 <b>53</b> 63:11 72:5 126:21 <b>53,000</b> 72:16 <b>54</b> 131:10 <b>557-9391</b> 3:5 <b>56</b> 72:4 <b>56,000</b> 72:16 <b>57</b> 64:24 90:11,13 <b>57,000</b> 207:3  <b>6</b> <b>6</b> 4:15,17 12:6 36:14 66:16,19 <b>60</b> 87:23 88:23 <b>60K</b> 87:19,24 88:1 <b>629</b> 178:10 <b>629,000</b> 178:8,9 <b>629,915</b> 176:21 <b>629,915.16</b> 176:21	178:4 <b>63,000</b> 130:2,10,12 <b>63,167</b> 36:15 <b>63,167.36</b> 77:12 <b>658</b> 122:3 <b>66</b> 4:15 <b>684</b> 107:12 <b>6th</b> 127:10  <b>7</b> <b>7</b> 4:16 12:11 16:10 16:13 71:19,20 138:9 198:8 <b>7,000</b> 136:24 137:4 <b>7:00</b> 69:7 <b>71</b> 4:16 <b>75</b> 4:17 <b>750</b> 128:14 <b>75202</b> 3:4 <b>757</b> 161:8 <b>758</b> 165:25 <b>759</b> 170:15 <b>760</b> 167:18 <b>761</b> 168:23 <b>762,please</b> 169:11 <b>763</b> 169:25 171:15 <b>766</b> 203:2 <b>767</b> 206:18 <b>768</b> 209:4 <b>769</b> 210:7 <b>770</b> 211:16 <b>79</b> 4:18  <b>8</b> <b>8</b> 4:5,9,17 12:15,20 75:24,25 113:15 <b>8,000</b> 102:8 110:21 <b>800</b> 23:7,17 81:23 <b>81,038.33</b> 166:21 <b>83</b> 4:19 <b>84</b> 139:3 <b>87</b> 4:21 <b>89</b> 4:22 <b>89,000</b> 101:23 <b>8th</b> 43:15 112:13  <b>9</b>	<b>9</b> 4:18 35:12 79:11 79:12,16 <b>9:57</b> 2:19 6:2,11 <b>90067</b> 6:13 <b>901</b> 3:4 <b>92675</b> 3:14 <b>941</b> 101:12,14 <b>941,000</b> 101:11 <b>949</b> 3:15 <b>95</b> 87:20 137:20 <b>96</b> 5:5 <b>98</b> 126:5 <b>9th</b> 36:9 40:1 43:19 54:23
---	--	--	---